

Draft Rule Change Report: Removal of Market Operation Market Procedures (RC_2015_01)

Standard Rule Change Process

15 March 2019

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1. Rule Change Process and Timeline

On 3 March 2015, the Independent Market Operator (**IMO**) submitted a Rule Change Proposal titled "Removal of Market Operation Market Procedures" (RC_2015_01).

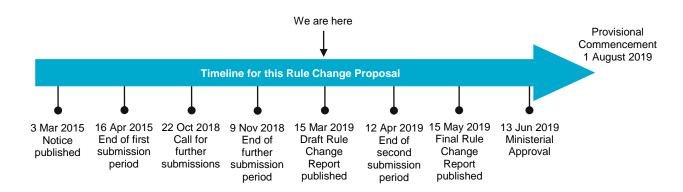
The Rule Change Proposal aims to remove unnecessary prescription in the Wholesale Electricity Market (**WEM**) by removing the names of Market Procedures in the Wholesale Electricity Market Rules (**Market Rules**), which will enable documented processes to be streamlined, and will allow removal of associated obligations that duplicate the requirement for compliance with particular Market Procedures in specific Market Rules.

The Rule Change Proposal was progressed using the Standard Rule Change Process, described in section 2.7 of the Market Rules.

The timeframe for the preparation of the Draft Rule Change Report was extended by the IMO under clause 2.5.10 of the Market Rules; and was further extended by the Rule Change Panel under clauses 1.18.3(b) and 2.5.10 of the Market Rules. Further details of the extensions are available on the Rule Change Panel's website.

On 22 October 2018, the Rule Change Panel published a call for further submissions on the basis that a significant period of time had passed since the IMO consulted on the Rule Change Proposal, during which the Market Rules had undergone numerous changes.

The key dates for progressing the Rule Change Proposal are:



The commencement date is provisional and may be subject to change in the Final Rule Change Report.

The Rule Change Panel's proposed decision is to accept the Rule Change Proposal in a modified form, as set out in section 6.1 of this Draft Rule Change Report.

All documents related to the Rule Change Proposal can be found on the Rule Change Panel's website at https://www.erawa.com.au/rule-change-panel/market-rule-changes/rule-change-rc 2015 01.



2. Call for Second Round Submissions

The Rule Change Panel invites interested stakeholders to make submissions on this Draft Rule Change Report.

Submissions must be delivered to the Rule Change Panel by **5:00 PM** on **Friday**, **12 April 2019**.

The Rule Change Panel prefers to receive submissions by email, using the submission form available at: https://www.erawa.com.au/rule-change-panel/make-a-rule-change-submission sent to support@rcpwa.com.au.

Submissions may also be sent to the Rule Change Panel by post, addressed to:

Rule Change Panel Attn: Executive Officer C/o Economic Regulation Authority PO Box 8469 PERTH BC WA 6849

3. Proposed Amendments

3.1 The Rule Change Proposal

The Rule Change Proposal sought to amend the head of power clauses for several Market Procedures relating to the daily operation of the WEM that would result in the removal of one Market Procedure, and allow the IMO to consolidate certain other Market Procedures to streamline the documentation with respect to related processes.

In particular, the Rule Change Proposal sought to:

- remove references to the specified names of Market Procedures in various clauses in the Market Rules, and instead refer to 'a Market Procedure' in clauses 4.28A.3, 7A.1.6, 7A.3.3, 7A.3.19, 7A.3.20, 7B.3.3, 9.2.1, 9.4.3, the section 9.2 heading and the Glossary in the Market Rules. The suggested changes to clauses 4.28A.3 and 9.4.3 of the Market Rules would retain the requirement for documentation of the information in a Market Procedure, but not in a specific named Market Procedure;
- create a new head of power clause for the creation of a Market Procedure that outlines
 certain operational processes, including the processes to be followed by the IMO when
 determining a Forecast Balancing Merit Order, a Balancing Forecast and assigning
 priorities to Balancing Facilities and LFAS Facilities in the event of a tie,¹ to provide more
 specific information about these processes;
- delete the head of power clause 8.6.2 of the Market Rules which requires the format of Meter Data Submissions to be documented, resulting in the removal of the requirement for the Market Procedure: Meter Data Submissions;
- remove the explicit requirement in clauses 4.28A.3 and 9.2.1 of the Market Rules for the IMO and Market Participants to comply with the relevant Market Procedure, on the grounds that a general requirement for the IMO and Market Participants to comply with

Where more than one Balancing Facility or LFAS Facility has identical Price-Quantity pairs in the Forecast BMO or the Forecast LFAS Merit Order (as applicable), AEMO is required to break the tie in accordance with clauses 7A.3.3 and 7B.3.3 of the Market Rules, respectively.



Market Procedures was contained in clauses 2.9.6, 2.9.7 and 2.9.8 of the Market Rules; and

• make minor drafting improvements to clauses 4.28A.3, 7A.1.6, 7A.3.21, 7B.3.3 and 9.4.3 and the Glossary in the Market Rules.

Since the formal submission of the Rule Change Proposal:

- the Market Rules have changed significantly; and
- the market operator function has transferred from the IMO to AEMO.

Therefore, the Rule Change Panel has applied the proposed changes to the current Market Rules as amended by:

- Rule Change Proposal RC_2017_06: Reduction to the prudential exposure in the Reserve Capacity Mechanism, which will commence on 1 June 2019; and
- Rule Change Proposal RC_2014_06: Removal of Resource Plans and Dispatchable Loads, which will commence on 1 July 2019.

The Rule Change Panel notes that the reasons for the proposed changes are, in most cases, unaffected by changes made to the Market Rules since the submission of the Rule Change Proposal and the transfer of the market operator function from the IMO to AEMO.

Full details of the Rule Change Proposal are available at the Rule Change Panel's website.

3.2 The IMO's Initial Assessment of the Proposal

The IMO decided to progress the Rule Change Proposal on the basis of its preliminary assessment that the proposed amendments were likely to better achieve Wholesale Market Objectives (a), (b) and (d), and were consistent with the remaining Wholesale Market Objectives.

4. Consultation

4.1 The Market Advisory Committee

A Pre-Rule Change Proposal was discussed by the Market Advisory Committee (**MAC**) at the 12 February 2015 meeting. MAC members agreed for the IMO to progress the Rule Change Proposal under the Standard Rule Change Process.

4.2 Submissions Received During the First Submission Period

The first submission period for the Rule Change Proposal was held between 4 March 2015 and 16 April 2015. Submissions were received from Community Electricity and Perth Energy.

Community Electricity expressed support for the Rule Change Proposal on the basis that the proposed amendments are administrative and streamline the Market Procedures, and are consistent with the Wholesale Market Objectives.

Perth Energy expressed support for the proposed amendments noting that rationalising the number of Market Procedures and removing unnecessary ones is likely to improve the transparency of the WEM and make it easier for all Market Participants to comply with the legal framework in place.



Perth Energy also expressed support for allowing the IMO more flexibility in how it collates information into Market Procedures in a logical and efficient way.

The assessment by submitting parties as to whether the Rule Change Proposal would better achieve the Wholesale Market Objectives is summarised in Table 1. A copy of the submissions received during the first submission period is available on the Rule Change Panel's website.

Table 1: Submitting Parties' Assessment as to Whether the Rule Change Proposal Would Better Achieve the Wholesale Market Objectives

Submitter	Wholesale Market Objective Assessment
Community Electricity	Community Electricity considers that the Rule Change Proposal improves the integrity of the Market Rules and is consistent with all of the Wholesale Market Objectives.
Perth Energy	Perth Energy considers the proposed changes are likely to improve the clarity and transparency of the processes currently covered by the Market Procedures covered by this change proposal and lead to a more efficient and streamlined set of guidelines for Market Participants. This is therefore likely to improve the ability to achieve Market Objectives (a) and (b). We have not identified any impacts on the remaining Market Objectives.

4.3 The Rule Change Panel's Response to Submissions Received During the First Submission Period

No specific issues were raised. A general discussion of the Rule Change Proposal, which includes the Rule Change Panel's draft assessment of the proposed amendments to the Market Rules, is available in section 5.1 of this Draft Rule Change Report.

4.4 Call for Further Submissions

On 22 October 2018, the Rule Change Panel published a call for further submissions on the Rule Change Proposal because:

- a significant amount of time had passed since the IMO consulted on the Rule Change Proposal; and
- the Market Rules had undergone numerous changes since the publication of the Rule Change Proposal.

The Rule Change Panel sought submissions from stakeholders on the Rule Change Proposal, and specifically on the following proposed changes:

- the proposed deletion of clause 8.6.2 of the Market Rules; and
- whether Market Procedures should be referred to by name in the Market Rules, or by reference to the head of power clauses under which they are created.

The call for further submissions is available on the Rule Change Panel's website.

4.5 Submissions Received During the Further Submission Period

The further submission period was held between 23 October 2018 and 9 November 2018. The Rule Change Panel received submissions from AEMO², Alinta Energy and Synergy.

AEMO supported the proposed amendments and considers that the Rule Change Proposal will enable AEMO to improve the existing documentation of various obligations, processes and methodologies under the Market Rules. AEMO expressed the view that the improved transparency or information in the market will reduce the risk of:

- (a) non-compliance with the Market Rules;
- (b) making inconsistent operational decisions;
- (c) increased administrative burden, service delivery and loss of productivity; and
- (d) increased compliance costs.

AEMO supported removing the names of Market Procedures from the Market Rules, and instead that Market Procedures are referred to in the Market Rules as 'a/the Market Procedure', and Power System Operation Procedures as 'a/the Power System Operation Procedure', with reference to the head of power clause under which they are created.

Alinta supported rationalising and removing unnecessary Market Procedures, and suggested the Rule Change Proposal be expanded to name all Market Procedures and Power System Operation Procedures in the Market Rules. Alinta considers that this will improve the clarity and understandability of the WEM arrangements for both existing and new participants.

Alinta also supported the Rule Change Panel's proposal to retain clause 8.6.2. AEMO and Synergy did not specifically comment on the Rule Change Panel's intention to retain clause 8.6.2 of the Market Rules in their submissions. However, in subsequent discussions with the Rule Change Panel, AEMO has confirmed that it does not oppose the Rule Change Panel's intention to retain clause 8.6.2.

Synergy supported the proposed amendments that require AEMO to document the processes involved in developing Balancing Forecasts in a Market Procedure.

The assessment by submitting parties as to whether the Rule Change Proposal would better achieve the Wholesale Market Objectives is summarised in Table 2.

Table 2: Submitting Parties' Assessment as to Whether the Rule Change Proposal Would Better Achieve the Wholesale Market Objectives

Submitter	Wholesale Market Objective Assessment
AEMO	AEMO agrees with the Wholesale Market Objective assessment set out in the original 2015 proposal.
Synergy	Synergy considers that there is potential for the proposed change to better facilitate the achievement of the Wholesale Electricity Market objectives by improving the market's transparency. Improving Market Participants' understanding of Balancing Forecasts may improve market efficiency.
Alinta	Not provided.

² AEMO's submission was received on 11 November 2018, which was outside the further submission period.



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A copy of the submissions received during the further submission period is available on the Rule Change Panel's website.

4.6 The Rule Change Panel's Response to Submissions Received During the Further Submission Period

The Rule Change Panel's response to each of the specific issues raised in the further submission period is presented in Appendix A of this Draft Rule Change Report. See also section 5.1 of this Draft Rule Change Report for a general discussion of the Rule Change Proposal, which addresses the main issues raised in submissions and the Rule Change Panel's response to these issues.

4.7 Public Forums and Workshops

No public forums or workshops were held in regard to the Rule Change Proposal.

5. The Rule Change Panel's Draft Assessment

In preparing its Draft Rule Change Report, the Rule Change Panel must assess the Rule Change Proposal in light of clauses 2.4.2 and 2.4.3 of the Market Rules.

Clause 2.4.2 of the Market Rules states that the Rule Change Panel "must not make Amending Rules unless it is satisfied that the Market Rules, as proposed to be amended or replaced, are consistent with the Wholesale Market Objectives". Additionally, clause 2.4.3 of the Market Rules states that, when deciding whether to make Amending Rules, the Rule Change Panel must have regard to:

- any applicable statement of policy principles the Minister has issued to the Rule Change Panel under clause 2.5.2 of the Market Rules;
- the practicality and cost of implementing the proposal;
- the views expressed in submissions and by the MAC; and
- any technical studies that the Rule Change Panel considers necessary to assist in assessing the Rule Change Proposal.

When making its draft decision, the Rule Change Panel has had regard to each of the matters identified in clauses 2.4.2 and 2.4.3 of the Market Rules as follows:

- the Rule Change Panel's assessment of the Rule Change Proposal against the Wholesale Market Objectives is available in section 5.3 of this Draft Rule Change Report;
- the Rule Change Panel notes that there has not been any applicable statement of policy principles from the Minister in respect of the Rule Change Proposal;
- the Rule Change Panel's assessment of the practicality and cost of implementing the Rule Change Proposal is available in section 5.4 of this Draft Rule Change Report;
- a summary of the views expressed in submissions and by the MAC is available in section 4 of this Draft Rule Change Report. The Rule Change Panel's response to these views is available in section 4.3 and 4.6 of this Draft Rule Change Report; and
- the Rule Change Panel does not believe a technical study in respect of the Rule Change Proposal is required and therefore has not commissioned one.

The Rule Change Panel's assessment is presented in the following sections.

5.1 Assessment of the Proposed Changes

5.1.1 Removal of unnecessary administrative prescription

The Rule Change Proposal sought to reduce unnecessary administrative prescription in the Market Rules by progressing a changed drafting style that removes the names of Market Procedures and instead refers to 'a Market Procedure'. The Rule Change Panel notes that the Rule Change Proposal considers changing the referencing for only five Market Procedures. The Rule Change Panel suggested in the call for further submissions that it would be efficient and cost effective to address the referencing of all Market Procedures (including Power System Operation Procedures) in the Market Rules as part of the Rule Change Proposal.

In its submission, Alinta suggested that all Market Procedures and Power System Operation Procedures are explicitly named in the Market Rules. Alinta considers that naming the Market Procedures and Power System Operation Procedures will improve the clarity and understandability of the WEM arrangements for both existing and new participants.

The Rule Change Panel considers that naming all Market Procedures and Power System Operation Procedures in the Market Rules, and requiring AEMO to document processes in particular Market Procedures or Power System Operation Procedures is inefficient and administratively burdensome. However, the Rule Change Panel considers that it is important that Market Participants are able to readily identify in which Market Procedure or Power System Operation Procedure processes or obligations have been documented.

Therefore, the Rule Change Panel proposes to include new clauses 2.9.2D and 2.9.2E to require AEMO to publish and maintain a list of all Market Procedures and Power System Operation Procedures on the Market Web Site and other information that will enable Market Participants to readily identify the Market Procedures or Power System Operation Procedures in which obligations, processes or requirements in the Market Rules are documented. The required information will include:

- the name of the Market Procedure or Power System Operation Procedure;
- a brief description of the Market Procedure or Power System Operation Procedure; and
- each head of power clause in the Market Rules pursuant to which the Market Procedure or Power System Operation Procedure has been developed, and other clauses where obligations, processes or requirements are documented in the Market Procedure or Power System Operation Procedure.

Alinta has confirmed in subsequent discussions with the Rule Change Panel that the Rule Change Panel's proposal to include a new clause requiring AEMO to publish and maintain a list of all Market Procedures and Power System Operation Procedures and the associated heads of power clauses in the Market Rules on the Market Web Site addresses its concerns.

Even though the Amending Rules, as modified by the Rule Change Panel, will result in Market Procedures no longer being referred to by name in the Market Rules, in practical terms, AEMO will continue to give a name to each Market Procedure. Publishing a list on the Market Web Site will enable Market Participants to readily identify the Market Procedure in which the relevant obligation, process or requirements has been documented.

The Rule Change Panel notes that the Rule Change Proposal only sought to change the reference for five Market Procedures relating to the daily operation of the WEM. The Rule Change Panel considers that it would be efficient and cost effective to address the referencing of all Market Procedures as part of the Rule Change Proposal.

Therefore, the Rule Change Panel proposes further amendments to the proposed Amending Rules to replace all references to specific names of Market Procedures with the reference to the relevant head of power clause.

The Rule Change Panel also proposes further amendments to the proposed Amending Rules to clarify some references to Power System Operation Procedures by including a reference to the relevant head of power clause, or a reference to 'a' Power System Operation Procedure.

5.1.2 Market Procedure: Intermittent Load Refunds

The Rule Change Proposal proposed three changes regarding the Market Procedure: Intermittent Load Refunds.

- Amend clause 4.28A.3 of the Market Rules to require AEMO to document the process AEMO must follow in calculating Intermittent Load Refunds in 'a Market Procedure', instead of in the Reserve Capacity Procedure. The Rule Change Panel notes that clause 4.28A.3 in the current version of the Market Rules already reflects the intent of this proposed amendment.
- Document the process for calculating Intermittent Load Refunds in the Market Procedure: Settlements on the basis that the calculation of Intermittent Load Refunds is part of the non-STEM settlement process and therefore the explanation of the process and the input variables should be specified in that Market Procedure. The Rule Change Panel notes that clause 4.28A.3 of the current version of the Market Rules no longer specifies which Market Procedure the process is to be documented in, so no changes to the Market Rules are required to achieve the proposed amendment.
- Delete the Market Procedure: Intermittent Load Refunds on the basis that the current
 version of the Market Procedure does not include any additional information than is
 currently provided in section 4.28A of the Market Rules; and the calculation of
 Intermittent Load Refunds can be documented in the Market Procedure: Settlements.
 The Rule Change Panel notes that no changes to the Market Rules are required to
 achieve the intent of the proposed amendment, as clause 4.28A.3 in the current version
 of the Market Rules no longer refers to a specific Market Procedure, only a requirement
 that the process is documented in a Market Procedure.

5.1.3 Market Procedure: Meter Data Submissions

The Rule Change Proposal sought to delete clause 8.6.2 of the Market Rules, which requires AEMO to document the format of Meter Data Submissions in the Settlement Procedure. The Rule Change Proposal states that this requirement is redundant because the format of Meter Data Submissions is already covered in clause 8.6.1 of the Market Rules and is specified in detail in various subordinate documents to the Metering Code.

The Rule Change Panel notes that clauses 8.6.1(f) and (g) of the Market Rules specify components of a Meter Data Submission that are not documented in the Metering Code or its subordinate documents, namely the format requirements for various counts of non-interval or accumulation meters. The Rule Change Proposal also states that format requirements for

this information is redundant because the information is not used for any settlement purposes. However, this information is required for the calculation of Individual Reserve Capacity Requirements,³ so the Rule Change Panel does not agree that the associated format requirements are redundant.

The Rule Change Panel further notes that the relationship between Meter Data Submissions as defined in clause 8.6.1 of the Market Rules and the Metering Code is not self-evident due to differences in terminology and other apparent discrepancies. The Rule Change Panel considers that it would be inappropriate to remove an obligation in the Market Rules to clarify the relationship until such time as these discrepancies have been addressed in a holistic manner.

As such the Rule Change Panel intends to reject the proposed deletion of clause 8.6.2, and instead update the clause to refer to 'a Market Procedure' instead of 'the Settlement Procedure'.

5.1.4 Market Procedure: Capacity Credit Allocation

The Rule Change Proposal sought to amend clause 9.4.3 of the Market Rules to require AEMO to document the method a Market Participant must use when making a Capacity Credit Allocation Submission in 'a Market Procedure', instead of in the Settlement Procedure. The Rule Change Proposal states that the information contained in the Market Procedure: Capacity Credit Allocation, is already included in either the Market Rules or the Market Participant Interface User Guide, and therefore it is unnecessary to repeat the information in a Market Procedure.

The Rule Change Proposal further states that clause 9.4.3 of the Market Rules is not a head of power clause, so there is no requirement to document a Market Procedure for Capacity Credit Allocation Submissions. Therefore, the Rule Change Proposal sought to delete the Market Procedure: Capacity Credit Allocations, and include any residual information in the Settlement Procedure.

The Rule Change Panel notes that the Amending Rules in the Rule Change Proposal RC_2017_06: Reduction to the prudential exposure in the Reserve Capacity Mechanism, which are scheduled to commence on 1 June 2019, include:

- amendments to clause 9.4.3, including removing the reference to the Settlements Procedure; and
- a new head of power clause 9.4.18 requiring AEMO to develop a Market Procedure for Capacity Credit Allocations (and other matters relating to sections 9.4 and 9.5 of the Market Rules).

The Rule Change Panel does not consider that a User Guide has sufficient standing under the Market Rules to replace a Market Procedure. The Rule Change Panel considers that clause 9.4.3 (as amended by RC_2017_06) and new clause 9.4.18 (introduced by RC_2017_06) of the Market Rules achieve the intent of the proposed amendment in the Rule Change Proposal, in that neither clause specifies which Market Procedure the process for Capacity Credit Allocations is documented in, only that it is documented in a Market Procedure. The Rule Change Panel therefore considers that this proposed amendment to the Market Rules is no longer applicable.

³ See Step 5A of Appendix 5 of the Market Rules.



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5.1.5 Market Procedure: Balancing Market Forecast

The Rule Change Proposal sought to amend clause 7A.3.20 of the Market Rules to refer to a Market Procedure (instead of the Balancing Forecast Market Procedure) to be developed under proposed new head of power clause 7A.3.19A of the Market Rules. At the time the Rule Change Proposal was submitted, clause 7A.3.20 of the Market Rules referred to the Balancing Forecast Market Procedure being documented in accordance with the principles specified in that clause (7A.3.20). However, the clause did not provide additional information about the processes that should be included in that Market Procedure. Instead, it was intended that the proposed new head of power clause 7A.3.19A of the Market Rules would specify the processes that must be documented in a Market Procedure.

The Rule Change Panel supports the proposed amendments as they clarify the requirements for the processes that are to be documented in a Market Procedure.

However, since the Rule Change Proposal was submitted, clauses 7A.3.1, 7A.3.2, 7A.3.3, 7A.3.4, 7A3.19, 7A.3.20 and 7A.3.21 have been deleted by the Amending Rules in RC_2014_06: Removal of Resource Plans and Dispatchable Loads, which will commence on 1 July 2019. However:

- the matters dealt with in deleted clause 7A.3.19 are now dealt with in clause 7A.3.1(d);
- the matters proposed to be dealt with in the proposed new head of power clause 7A.3.19A are now dealt with in replacement clause 7A.3.3; and
- the matters dealt with in deleted clause 7A3.20 are now dealt with in replacement clause 7A.3.4.

Therefore, the Rule Change Panel proposes to make changes to replacement clauses 7A.3.1, 7A.3.3 and 7A.3.4 in line with the intent of the proposed amendments in the Rule Change Proposal. Changes are also required to replacement clause 7A.3.2 to reflect some of the proposed changes to clause 7A.3.3 in the proposed Amending Rules set out in the Rule Change Proposal.

5.1.6 Minor Drafting Improvements

The Rule Change Proposal sought to make some minor amendments to various Market Rules for consistency with the proposed approach to remove the names of Market Procedures in the Market Rules, and to improve the clarity of the drafting. The Rule Change Panel supports the proposed amendments.

The Rule Change Proposal also sought to remove the requirement in clauses 4.28A.3 and 9.2.1 of the Market Rules for AEMO and Market Participants to comply with the specified Market Procedure, on the basis that a general requirement for AEMO and Market Participants to comply with Market Procedures is contained in clauses 2.9.7A and 2.9.8 of the Market Rules. The Rule Change Panel agrees with this assessment, and supports the proposed amendments to those clauses. In line with the amendments to those clauses, the Rule Change Panel also proposes to amend additional Market Rules to remove similar express requirements.

5.2 Additional Amendments to the Proposed Amending Rules

In the call for further submissions, the Rule Change Panel proposed further changes to the proposed Amending Rules to account for the changes made to the Market Rules since the



Rule Change Proposal was submitted. These changes are, to the extent required, reflected in the proposed Amending Rules in section 7 of this Draft Rule Change Report.

Following the further submission period, the Rule Change Panel has made some further changes to the proposed Amending Rules. A summary of these changes is provided in Table 3 below, and also shown in Appendix B of this Draft Rule Change Report. The Rule Change Panel has included comment boxes throughout the proposed Amending Rules in section 7 of this Draft Rule Change Report and Appendix B to provide context for the proposed additional changes.

Table 3: Amendments to the Proposed Amending Rules Following the Further Submission Period

Affected Clause	Reason for Further Proposed Amendment
1.14.1(e), 1.16.1(e), 1.17.1(d), 1.18.2(a) to (e) (inclusive), 2.2.2(c), 2.9.5, 2.11.1, 2.11.2, 2.13.2, 2.13.3, 2.13.6A, 2.13.6K, 2.13.9C, 2.15 (heading), 2.15.1, 2.15.2, 2.15.3, 2.15.6A, 2.15.6B, 2.15.6C, 2.27.6, 2.27.10(a), 2.27.15(a) and (b), 2.27.17, 2.30.11, 2.30A.6, 2.31.23, 2.35.4, 2.36A.1, 2.36A.2 (opening paragraph), (a), (c) and (e), 2.36A.5, 2.37.8, 2.43 (heading), 3.2.2, 3.2.4, 3.2.6, 3.2.8, 3.3.3, 3.4.9, 3.5.11, 3.11.14, 3.11.15, 3.16.4, 3.16.7, 3.16.8A, 3.16.10, 3.17.10, 3.18.3(c)(i) and (ii), 3.18.15(a) and (f)(i) and (ii), 3.18.21, 3.19.10, 3.19.14, 3.21.12, 3.21A.15, 3.21B.5, 3.21B.8, 4.5.15, 4.5.16, 4.5.17, 4.25A.1, 6.19.6(f), 6.19.10, 7.2.5, 7.6.13, 7.6A.7, 7.6A.8, 7.6A.10, 7.7.4A, 7.7.5B, 7.7.6(a) and (b), 7.9.19, 7.10.4, 7.13.1(eD), 7.13.3, 7A.1.6, 7A.3.1(d), 7A.3.2(c), 7A.3.3, 7A.3.4, 7A3.7, 7A.3.7A, 7A.3.15, 7B.1.2, 7B.1.4, 7B.3.2(c), 8.6.2, 9.2 (heading), 9.2.1, 9.20.1, 10.2.7, Glossary definitions of 'Balancing Forecast' and 'Equivalent Planned Outage Hours' and Step 4(a)(i) of Appendix 9	 Amendments to: delete the specified name of Market Procedures (including Power System Operation Procedures); and/or to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate); and/or reference the relevant head of power clause (as appropriate).
4.5.14B, 4.9.10, 4.24.18, 6.17.6F, 7A.1.6(a), 7A.1.6, 7B.3.2(c), 8.6.2, 10.2.7 and the Glossary definition of 'Balancing Forecast'	Minor amendments to improve the clarity of the drafting.
1.14.1 (opening paragraph) and (e), 1.16.1 (opening paragraph) and(e), 1.17.1 (opening paragraph) and (d), 1.18.2 (opening paragraph), 2.15.6C, 2.36A.1, 2.36A.2, 4.5.14B, 4.13.8, 4.14.11, 4.28B.9, 4.28C.15, 6.17.6F, 7.6A.7, 7.6A.8 and 10.2.7	Minor amendments for consistency with the current drafting style of the Market Rules.

Affected Clause	Reason for Further Proposed Amendment
New clauses 2.9.2D and 2.9.2E	AEMO to publish and maintain a list of all Market Procedures and Power System Operation Procedures on the Market Web Site, together with other information to enable Market Participants to identify the Market Procedures and Power System Operation Procedures where obligations, processes or requirements in the Market Rules have been documented.
2.15.7	Amendments to delete the clause as the proposed amendments to clauses 2.15.1 and 2.15.6A make it clear that the protocols referred to in those clauses are Market Procedures, and the Market Rules prescribe a process for the development and amendment of Market Procedures.
7B.3.2(c)	Amendments to reflect the intent of the proposed changes to clause 7B.3.3 in the initial proposed Amending Rules.
8.6.2	Amendment to reflect the intent of the Rule Change Proposal to remove specified Market Procedure names. As outlined in section 5.1.3 of this report, the proposed deletion of this clause in the Rule Change Proposal is rejected.
2.9.5, 2.13.6K, 2.30.11, 2.30A.6, 2.31.23, 2.35.4, 2.36.5, 2.36A.5, 2.43.1, 3.11.14, 3.11.15, 3.16.10, 3.17.10, 3.18.21, 3.19.14, 3.21.12, 3.21A.15, 3.21B.8, 4.5.14, 4.5.14B, 4.9.10, 4.13.8, 4.14.11, 4.17.9, 4.24.18, 4.25.14, 4.27.12, 4.28A.3, 4.28B.9, 4.28C.15, 6.17.6F, 7.6.13, 7.6A.7, 7.7.5A, 7.13.3, 9.2.1 and 10.2.7	Amendments to remove the express requirement for the person(s) named in a clause to follow or comply with Market Procedures (including Power System Operation Procedure), because the Market Rules contain general requirements to comply with the Market Procedures, including: • 2.9.7 (System Management); • 2.9.7A (AEMO); • 2.9.7B (ERA); • 2.9.7C (Rule Change Panel); and • 2.9.8 (Rule Participants other than AEMO or System Management).
2.13.6A, 2.15.6A, 2.31.23, 2.36A.5, 2.37.8, 3.2.4, 3.11.15, 3.18.15(a) and (f)(i), 3.21.12, 4.13.8, 4.14.11, 4.24.18, 4.28A.3, 7.13.3 and 9.4.18(b)	Minor amendments to correct typographical errors, drafting oversights, and consequential changes resulting from proposed amendments outlined in this table.

Affected Clause	Reason for Further Proposed Amendment
Glossary definitions of 'Administration Procedure', 'Balancing Forecast Market Procedure', 'IMS Interface Market Procedure', 'Monitoring and Reporting Protocol' and 'Monitoring Protocol'	Amendment to delete redundant definitions, as specified names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules.

5.3 Wholesale Market Objectives

The Rule Change Panel considers that the proposed amendments, as modified following the further submission period, will better achieve Wholesale Market Objectives (a) and (d), and are consistent with the other Wholesale Market Objectives. This is because:

- removing unnecessary administrative prescription in the Market Rules by removing the names of Market Procedures and allowing AEMO the flexibility to document processes in a Market Procedure instead of a specific named Market Procedure will decrease the overall cost of administering the WEM and therefore promote economic efficiency in the WEM; and
- allowing AEMO to consolidate Market Procedures to streamline the documentation with respect to related processes is likely to improve Rule Participants understanding of their obligations under the WEM, thereby reducing compliance costs, which will minimise the long-term cost of electricity supplied to customers.

5.4 Protected Provisions, Reviewable Decisions and Civil Penalties

It is proposed to amend clauses 2.2.2(c), 2.9.5, 2.11.1, 2.11.2, 2.13.2, 2.13.3, 2.13.6A, 2.13.6K, 2.13.9C, 2.15.1, 2.15.2, 2.15.3, 2.15.6A, 2.15.6B, 2.15.6C, 2.15.7, 4.5.15, 4.5.16 and 4.5.17 of the Market Rules, which are Protected Provisions. In addition, new proposed clauses 2.9.2D and 2.9.2E will automatically become Protected Provisions. Under clause 2.8.3 of the Market Rules, the Amending Rules in the Rule Change Proposal must be approved by the Minister if they affect a Protected Provision.

The proposed Amending Rules do not amend any reviewable decisions or civil penalty provisions, nor does the Rule Change Panel consider that any of the proposed new Amending Rules should be reviewable decisions or civil penalty provisions.

5.5 Practicality and Cost of Implementation

5.5.1 Cost

AEMO considers that the Rule Change Proposal may reduce administrative effort associated with the ongoing maintenance of procedures, and expects that any changes can be made as part of its business-as-usual procedure change processes. Further, AEMO currently publishes the names of each Market Procedure and Power System Operation Procedures on the Market Website together with the associated head of power clause in the Market Rules. Therefore, AEMO does not expect to incur any direct costs to implement the proposed Amending Rules.



In their first period submissions, Community Electricity and Perth Energy indicated that there would be no impacts arising for either of them from the Rule Change Proposal.

In its further period submission, Synergy stated that it does not expect to incur significant costs as a result of the Rule Change Proposal.

5.5.2 Practicality

AEMO notes in its further period submission that, as the proposed amendments to the Market Rules are administrative in nature, it supports the indicative timeframes to be determined by the Rule Change Panel.

Community Electricity and Perth Energy indicated in their first period submissions that there would be no impacts arising for either of them from the Rule Change Proposal.

Synergy stated in its further period submission that it does not expect to expend significant time in implementing any changes resulting from the Rule Change Proposal.

The Rule Change Proposal is also affected by some of the proposed Amending Rules in RC_2013_15: Outage Planning Phase 2 – Outage Process Refinements. If the proposed Amending Rules in RC_2013_15 are approved and scheduled to commence before the Amending Rules in the Rule Change Proposal (if approved by the Rule Change Panel), the changes will be reflected in the Final Rule Change Report.

5.5.3 Amendments to Associated Market Procedures

The proposed Amending Rules require AEMO to:

- update the Balancing Market Forecast Market Procedure; and
- publish a list on the Market Web Site that specifies:
 - the head of power clause under which an obligation, process or requirement is required to be documented in a Market Procedure; and
 - the name of the Market Procedure in which that obligation, process or requirement is documented, and a brief description of it.

AEMO may also need to make changes to a range of market documents that it publishes, including market design summaries and user guides.

6. The Rule Change Panel's Draft Decision

The Rule Change Panel's draft decision is to accept the Rule Change Proposal in a modified form, as set out in section 7 of this Draft Rule Change Report.

6.1 Reason for the Rule Change Panel's Draft Decision

The Rule Change Panel has made its draft decision on the basis that the Amending Rules, as modified in section 7 of this Draft Rule Change Report will:

- remove unnecessary administrative prescription in the Market Rules by removing the names of Market Procedures;
- improve clarity in the Market Rules by consistently referencing Market Procedures;



- allow AEMO the flexibility to document processes in a Market Procedure instead of a specifically named Market Procedure;
- allow AEMO to consolidate Market Procedures to streamline the documentation with respect to related processes which may:
 - improve Rule Participants' understanding of their obligations under the WEM, which may reduce the risk of non-compliance with the Market Rules;
 - o reduce the risk of inconsistent operational decisions; and
- allow the Market Rules to better achieve Wholesale Market Objectives (a) and (d); and will be consistent with the remaining Wholesale Market Objectives; and
- create no significant practicality or costs issues.

Additional detail on the analysis behind the Rule Change Panel's decision is provided in section 5 of this Draft Rule Change Report.

6.2 Proposed Commencement

Subject to Ministerial approval, the Amending Rules are proposed to commence at 8:00 AM on 1 August 2019.

7. Amending Rules

The Rule Change Panel proposes to implement the following Amending Rules (deleted text, added text, clauses that are included for context but not amended). The Amending Rules are presented below in their entirety, marked up against the Market Rules as at 11 January 2019; the Amending Rules in RC_2017_06: Reduction to the prudential exposure in the Reserve Capacity Mechanism, which will commence on 1 June 2019; and RC_2014_06: Removal of Resource Plans and Dispatchable Loads, which will commence on 1 July 2019.

. . .

Clause 1.14.1 is proposed to be amended:

- to delete the name of the Market Procedure (AEMO's Monitoring and Reporting Protocol) in subclause (e), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.
- 1.14.1. On and from the AEMO Transition—Date—Date:

...

(e) until the date on which-a Monitoring and Reporting Protocol the Market

Procedure specified in clause 2.15.6A developed by AEMO is approved by the Economic Regulation Authority under clause-2.15.6A—2.15.6A:

. . .

. . .

. . .

Clause 1.16.1 is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring and Reporting Protocol) in subclause (e), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.
- 1.16.1. On and from the System Management Transition—Date—Date:

. . .

(e) AEMO may amend its Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A to incorporate its System Management Functions, and until it is amended amended:

. . .

. . .

. .

Clause 1.17.1 is proposed to be amended:

• to delete the name of the Market Procedure (Monitoring Protocol) in subclause (d); and

for consistency with the current drafting style of the Market Rules.

1.17.1. On and from the ERA Transfer—Date—Date:

. . .

(d) where the Economic Regulation Authority is required to develop or maintain a Market Procedure (including the Monitoring Protocol Market Procedure that is required to be maintained in accordance with clause 2.15.1), and that Market Procedure was developed or maintained by the IMO prior to the ERA Transfer Date, then—then:

. . .

...

. . .

Clause 1.18.2 is proposed to be amended:

- to delete the name of the Market Procedure (Administration Procedure) in subclauses (a) to (e) (inclusive), and instead, where applicable, refer to the Market Procedure specified in (head of power) clause 2.9.5; and
- for consistency with the current drafting style of the Market Rules.

1.18.2. On and from the Rule Change Panel Transfer Date Date:

- (a) any-Administration Market Procedure developed by AEMO under clause 2.9.5 prior to the Rule Change Panel Transfer Date is deemed to have been developed by the Rule Change Panel in accordance with clause 2.9.5;
- (b) any reference to AEMO in the <u>Administration Market</u> Procedure <u>specified in clause 2.9.5</u> that should be a reference to the Rule Change Panel having regard to the Rule Change Panel's functions, powers, rights and obligations under these Market Rules and the Market Procedures is deemed to be a reference to the Rule Change Panel;
- (c) the Rule Change Panel may amend the <u>Administration Market</u> Procedure specified in clause 2.9.5 to refer to the Rule Change Panel instead of AEMO (where appropriate) and make any necessary consequential amendments without undertaking the Procedure Change Process;
- (d) the Administration Market Procedure which is amended by the Rule Change Panel in accordance with this clause 1.18.2 may commence operation on the date and time determined by the Rule Change Panel and published on the Market Web Site; and
- (e) notwithstanding the operation of this clause 1.18.2, the Rule Change Panel is not liable for any act, matter or thing done by AEMO prior to the Rule Change Panel Transfer Date in breach of these Market Rules or any Market Procedure (including the Administration Procedure).

. . .

Clause 2.2.2 is proposed to be amended to delete the name of the Market Procedure (IMS Interface Procedure) in subclause (c).

2.2.2. The other functions of System Management in relation to the Wholesale Electricity Market are:

. . .

(c) to develop Market Procedures relevant to System Management (including the Power System Operation Procedures—and the IMS Interface Procedure), and amendments and replacements for them, where required by these Market Rules;

. . .

...

Proposed new clauses 2.9.2D and 2.9.2E require AEMO to publish and maintain a list of all Market Procedures and Power System Operation Procedures on the Market Web Site, together with other information that will enable Market Participants to identify the Market Procedures or Power System Operation Procedures in which obligations, processes or requirements in the Market Rules are documented.

- 2.9.2D. AEMO must develop and maintain on the Market Web Site a list of all Market Procedures and Power System Operation Procedures. For each Market Procedure and Power System Operation Procedure the list must:
 - (a) <u>state the name of the Market Procedure or Power System Operation</u> Procedure;
 - (b) give a brief description of the Market Procedure or Power System
 Operation Procedure; and
 - (c) specify:
 - i. each head of power clause in the Market Rules pursuant to which the Market Procedure or Power System Operation Procedure has been developed; and
 - ii. if not already covered under clause 2.9.2D(c)(i), each clause in the Market Rules which requires that an obligation, process or requirement be documented in a Market Procedure or Power System Operation Procedure, that has been documented in that Market Procedure or Power System Operation Procedure.
- 2.9.2E. AEMO must maintain and keep up to date the list referred to in clause 2.9.2D.

. . .



Clause 2.9.5 is proposed to be amended to:

- delete the name of the Market Procedure (Administration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.9.5. The Rule Change Panel must develop an a Market Administration Procedure setting out the procedure for developing and amending Market Procedures. and:
 - (a) AEMO must follow the Administration that Market Procedure when developing and approving Procedure Change Proposals;
 - (b) System Management must follow the Administration that Market Procedure when developing Procedure Change Proposals;
 - (bA) the Economic Regulation Authority must follow the Administration that Market Procedure when developing Procedure Change Proposals;
 - (bB) the Rule Change Panel must follow the Administration that Market Procedure when developing Procedure Change Proposals; and
 - (c) Rule Participants involved in the Procedure Change process must follow the Administration that Market Procedure when assisting the Rule Change Panel, AEMO or System Management to develop Procedure Change Proposals.

..

Clause 2.11.1 is proposed to be amended to delete the name of the Market Procedure (Administration Procedure), and instead refer to the Market Procedure specified in (head of power) clause 2.9.5.

2.11.1. A Rule Participant may apply to the Electricity Review Board for a Procedural Review of a decision by the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority, as applicable, contemplated by clauses 2.10.2A(a) or 2.10.13 within the time specified in regulation 44 of the WEM Regulations, on the grounds that the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority, as applicable, has not followed the process set out in section 2.10 or the <u>Administration Market</u> Procedure <u>specified in clause 2.9.5</u>.

Clause 2.11.2 is proposed to be amended to delete the name of the Market Procedure (Administration Procedure), and instead refer to the Market Procedure specified in (head of power) clause 2.9.5.

2.11.2. Following an application for a Procedural Review under clause 2.11.1, if the Electricity Review Board finds that the Rule Change Panel, AEMO, System

Management or the Economic Regulation Authority has not followed the process set out in section 2.10 or the <u>Administration Market Procedure specified in clause 2.9.5</u>, the Electricity Review Board may set aside the Rule Change Panel's decision, AEMO's decision, System Management's decision or Economic Regulation Authority's decision and direct the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority to reconsider the relevant Procedure Change Proposal in accordance with section 2.10 and the <u>Administration Market Procedure specified in clause 2.9.5</u>.

. . .

Clause 2.13.2 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.13.2. The Economic Regulation Authority must monitor other Rule Participants' behaviour (including AEMO's and System Management's behaviour) for compliance with the Market Rules and Market Procedures in accordance with the Monitoring Protocol Market Procedure specified in clause 2.15.1.

Clause 2.13.3 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.13.3. The Economic Regulation Authority must ensure it has processes and systems in place to allow it to monitor Rule Participants' behaviour for compliance with the Market Rules and Market Procedures in accordance with the Monitoring Protocol Market Procedure specified in clause 2.15.1.

. . .

Clause 2.13.6A is proposed to be amended to:

- correct a minor typographical oversight; and
- delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.
- 2.13.6A. Subject to clause 2.13.6B, System Management must report any alleged breaches of the provisions of the Market Rules referred to in clause 2.13.9 or the Power System Operation Procedures to the Economic Regulation Authority in accordance with the Monitoring and Reporting Protocol Market Procedure specified in clause 2.15.6A developed by AEMO.

. . .

Clause 2.13.6K is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market
 Procedure (or Power System Operation Procedure) (as appropriate), and a reference to
 the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.13.6K. System Management must document the procedure for determining and reviewing the annual Tolerance Range and any Facility Tolerance Ranges in the <u>a</u> Power System Operation Procedure, and System Management and Market Participants must follow that documented Power System Operation Procedure.

. . .

Clause 2.13.9C is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

2.13.9C. If AEMO becomes aware of an alleged breach of the Market Rules (other than a provision of the Market Rules referred to in clause 2.13.9) or the Market Procedures developed by AEMO then it must notify the Economic Regulation Authority in accordance with the Monitoring and Reporting Protocol Market Procedure specified in clause 2.15.6A developed by AEMO.

. . .

The section 2.15 heading is proposed to be amended for consistency with the intent of the Rule Change Proposal to delete the name of Market Procedures (including Power System Operation Procedures).

2.15. Monitoring and Reporting Protocols Requirements

Clause 2.15.1 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol).

2.15.1. The Economic Regulation Authority must maintain and implement a monitoring protocol in a Monitoring Protocol Market Procedure.

Clause 2.15.2 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.15.2. The purpose of the Monitoring Protocol Market Procedure specified in clause

2.15.1 is to state how the Economic Regulation Authority will implement its obligations under these Market Rules to monitor Rule Participants' behaviour for compliance with the Market Rules and Market Procedures.

Clause 2.15.3 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

- 2.15.3. The Monitoring Protocol Market Procedure specified in clause 2.15.1 must specify:
 - the Economic Regulation Authority's monitoring processes for assessing compliance with the Market Rules and Market Procedures by Rule Participants;

. . .

. .

Clause 2.15.6A is proposed to be amended to:

- delete the name of the Market Procedure (Monitoring and Reporting Protocol); and
- make consequential changes to the clause.
- 2.15.6A. AEMO must develop and implement a <u>Monitoring monitoring and Reporting reporting Protocol in a Market Procedure</u> and seek the approval of the Economic Regulation Authority for that <u>Monitoring and Reporting Protocol Market Procedure</u>.

Clause 2.15.6B is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

2.15.6B. The purpose of AEMO's Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A is to state how AEMO (including in its capacity as System Management) will implement its obligations under these Market Rules to support the Economic Regulation Authority 's monitoring of Rule Participants' behaviour for compliance with the Market Rules in accordance with clauses 2.13.9A and 2.13.6, and with Market Procedures (including the Power System Operation Procedures) developed by AEMO.

Clause 2.15.6C is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.

- 2.15.6C. The Market Procedure specified in clause 2.15.6A must specify: AEMO's Monitoring and Reporting Protocol must specify—
 - (a) AEMO's processes (including in its capacity as System Management) for assisting the Economic Regulation Authority in monitoring and assessing compliance with the Market Rules and Market Procedures by Market Participants; and

...

. . .

Clause 2.15.7 is proposed to be deleted as the proposed amendments to clauses 2.15.1 and 2.15.6A make it clear that the protocols referred to in those clauses are Market Procedures, and the Market Rules prescribe a process for the development and amendment of Market Procedures.

2.15.7. [Blank] The Monitoring Protocol maintained by the Economic Regulation Authority and the Monitoring and Reporting Protocol developed by AEMO, are Market Procedures under these Market Rules, and must be developed and amended in accordance with clauses 2.9 and 2.10.

. . .

Clause 2.27.6 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

2.27.6. Each year by 1 June each Network Operator must, in accordance with the Market Procedure <u>specified in clause 2.27.17</u>for <u>Determining Loss Factors</u>, recalculate the Loss Factors for its connection points and provide AEMO with updated Transmission Loss Factors and Distribution Loss Factors (as applicable) for each Loss Factor Class in the Network Operator's classification system.

. . .

Clause 2.27.10 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors) in subclause (a), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

- 2.27.10. A Network Operator must develop new Loss Factor Classes if required to implement the classification system prescribed by AEMO for that Network Operator. If a Network Operator develops a new Loss Factor Class then it must:
 - (a) calculate the initial Transmission Loss Factor or Distribution Loss Factor
 (as applicable) for the new Loss Factor Class in accordance with the
 Market Procedure specified in clause 2.27.17 for Determining Loss Factors;
 and

...

. . .



Clause 2.27.15 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors) in subclauses (a) and (b), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

- 2.27.15. A Market Participant may apply to AEMO for a reassessment of any Transmission Loss Factor or Distribution Loss Factor applying to a Scheduled Generator, Non-Scheduled Generator, Interruptible Load or Non-Dispatchable Load registered to that Market Participant. The following requirements apply to each application for reassessment:
 - (a) The Market Participant must apply for reassessment in accordance with the Market Procedure specified in clause 2.27.17for Determining Loss Factors.
 - (b) AEMO must process an application for reassessment and where required conduct an audit of the relevant Loss Factor calculation in accordance with the Market Procedure <u>specified in clause 2.27.17</u> for <u>Determining Loss</u> <u>Factors</u>.

. . .

Clause 2.27.17 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors).

2.27.17. AEMO must, with the assistance of Network Operators, document the standards, methodologies, classification systems and procedures to be used in determining Loss Factors in the a Market Procedure for Determining Loss Factors.

Clause 2.30.11 is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.30.11. AEMO must document the facility aggregation and disaggregation process in the Registration a Market Procedure, and:
 - (a) applicants for facility aggregation or disaggregation must follow that documented Market Procedure; and
 - (b) AEMO must follow that documented Market Procedure when processing applications for facility aggregation and disaggregating previously aggregated facilities.



. . .

Clause 2.30A.6 reflects the clause as it appears in the Amending Rules RC_2014_07 that will commence on 1 July 2019, and is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.30A.6. AEMO must document the Spinning Reserve costs exemption process in the Registration a Market Procedure., and:
 - (a) applicants for exemption from Spinning Reserve costs must follow that documented Market Procedure; and
 - (b) AEMO must follow that documented Market Procedure when processing applications for exemption from Spinning Reserve cost funding.

- - -

Clause 2.31.23 is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure);
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them; and
- make consequential changes to the clause.
- 2.31.23. AEMO must document the registration, de-registration and transfer process in the Registration a Market Procedure, and:
 - applicants to register or de-register as a Rule Participant in a particular class must follow the documented Market Procedure applicable to that class; and
 - (b) applicants to register, de-register, or transfer a Facility in a particular Facility Class must follow the documented Market Procedure applicable to that class.; and
 - (c) [Blank]
 - (d) AEMO must follow that documented Market Procedure when processing applications for Rule Participant registration or de-registration, or for registration, de-registration or transfer of a facility.

. .

Clause 2.35.4 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market
 Procedure (or Power System Operation Procedure) (as appropriate), and a reference to
 the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.35.4. System Management must document the communications and control system requirements necessary to support the dispatch process described in these Market Rules in-the a Power System Operation Procedure.—System Management, Market Participants and Network Operators must comply with that documented Market Procedure in respect of communication and control system requirements.

. . .

Clause 2.36.5 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

2.36.5. AEMO must document the data and IT interface requirements, including security standards required for Market Participants to operate in the Wholesale Electricity Market in the relevant procedure to which the system pertains and AEMO and Market Participants must comply with that documented Market Procedure in respect of data and IT interface requirements.

Clause 2.36A.1 is proposed to be amended:

- to delete the name of the Market Procedure (IMS Interface Market Procedure); and
- for consistency with the current drafting style of the Market Rules.
- 2.36A.1. System Management must develop an IMS Interface a Market Procedure prescribing the reasonable arrangement by which Network Operators and AEMO must, subject to clause 2.36A.2, provide each other with information under these Market Rules, including including:
 - (a) the format, form and manner in which that information must be provided; and
 - (b) where the Market Rules do not provide a timeframe for the provision of the information, the time by which such information must be provided.



Clause 2.36A.2 is proposed to be amended:

- to delete the name of the Market Procedure (IMS Interface Market Procedure) in the opening paragraph and subclauses (a), (c) and (e), and instead refer to the Market Procedure to be documented under (head of power) clause 2.36A.1 (as applicable); and
- for consistency with the current drafting style of the Market Rules.
- 2.36A.2. Where the IMS Interface-Market Procedure specified in clause 2.36A.1 is inadequate to enable either System Management or a Network Operator to comply with an obligation to provide information to the other under these Market Rules, and such information is required in a timely manner for the efficient performance of System Management's functions, then the following process applies until such time as the IMS Interface-Market Procedure is amended to correct the inadequacy—inadequacy:
 - (a) a senior manager from each of System Management and the Network
 Operator must meet as soon as possible after the inadequacy in the IMS
 Interface Market Procedure is identified and seek to agree an amendment
 to the IMS Interface Market Procedure that addresses the inadequacy and
 which is consistent with these Market Rules;

. . .

(c) if no agreement is reached under clause 2.36A.2(a), then System Management and the Network Operator must meet as soon as possible and seek to agree an amendment to the IMS Interface-Market Procedure that addresses the inadequacy and which is consistent with these Market Rules, and develop a Procedure Change Proposal accordingly;

. . .

(e) if no agreement is reached under clause 2.36A.2(c) within five Business Days of the first meeting, then System Management, acting reasonably, must, as soon as practicable, develop and draft a Procedure Change Proposal seeking an amendment to the IMS Interface Market Procedure that addresses the inadequacy and which is consistent with these Market Rules.

. .

Clause 2.36A.5 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement

for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

2.36A.5. System Management must document in-the a Power System Operation Procedure the communications and control system requirements necessary to enable it to remotely monitor the performance of a Network described in these Market Rules. System Management, Market Participants and Network Operators must comply with that documented Market Procedure in respect of communications and control system requirements.

. . .

Clause 2.37.8 is proposed to be amended to:

- refer to the Market Procedure in (head of power) clause 2.43.1; and
- correct a minor typographical oversight.
- 2.37.8. Where any of the circumstances specified in the relevant-Market Procedure specified in clause 2.43.1 for the purposes of this clause (which are circumstances that may result in an increase or decrease in a Market Participant's Credit Limit) have occurred or may-occur, occur:
 - (a) the Market Participant must notify AEMO as soon as practicable if the circumstance may result in an increase in the Market Participant's Credit Limit; and
 - (b) the Market Participant may notify AEMO if the circumstance may result in a decrease in the Market Participant's Credit Limit.

. . .

The section 2.43 heading is proposed to be amended for consistency with the intent of the Rule Change Proposal to delete the name of Market Procedures (including Power System Operation Procedures).

2.43. Prudential Market Procedure Requirements

. . .

Clause 2.43.1 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

- 2.43.1. AEMO must develop a Market Procedure dealing with:
 - (a) determining Credit Limits;
 - (b) assessing persons against the Acceptable Credit Criteria;



- (c) Credit Support arrangements, including:
 - i. the form of acceptable guarantees and bank letters of credit;
 - ii. where and how it will hold cash deposits and how the costs and fees of holding cash deposits will be met;
 - iii. the application of monies drawn from Credit Support in respect of amounts owed by the relevant Market Participant to AEMO;
- (d) calculation of Trading Margins;
- the list of factors to be taken into account for assessing the expected value of transactions;
- (f) issuing of Margin Calls; and
- (g) other matters relating to clauses 2.37 to 2.42.

and Market Participants and AEMO must comply with that Market Procedure.

. . .

Clause 3.2.2 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.2.2. System Management must record Equipment Limit information in accordance with the Power System Operation Procedure specified in clause 3.2.7.

. .

Clause 3.2.4 is proposed to be amended to:

- refer to the Power System Operation Procedure in (head of power) clause 3.2.7; and
- make consequential changes to the clause.
- 3.2.4. Network Operators, in consultation with System Management, must determine any Security Limit in accordance with the Power System Operation Procedure specified in clause 3.2.7, and System Management must record Security Limit information in accordance with the that Power System Operation Procedure.

. . .

Clause 3.2.6 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

- 3.2.6. System Management must establish and modify the Technical Envelope in accordance with clause 3.2.5 and the Power System Operation Procedure specified in clause 3.2.7.
- 3.2.7. System Management must develop a Power System Operation Procedure documenting:



- (a) the process to be followed by System Management in maintaining Equipment Limit information;
- (b) the process to be followed by Network Operators and System Management in determining the Security Limits and maintaining Security Limit information;
- (c) the process to be followed by System Management in establishing and modifying the Technical Envelope; and
- (d) the processes to be followed by System Management to enable it to ensure the SWIS operates according to the Technical Envelope applicable to each SWIS Operating State.

Clause 3.2.8 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.2.8. System Management must ensure the SWIS operates in accordance with the Power System Operation Procedure <u>specified in clause 3.2.7</u> and the Technical Envelope for the applicable SWIS Operating State.

. . .

Clause 3.3.3 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.3.3. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will take into account in making a determination under clause 3.3.1.

. .

Clause 3.4.9 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.4.9. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will consider in making a determination under clause 3.4.1.

. . .

Clause 3.5.11 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.5.11. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will consider in making determination under clause 3.5.1.

. . .



Clause 3.11.14 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.11.14. System Management must document in the <u>a</u> Power System Operation Procedure the procedure to be followed, and must follow that documented Market Procedure, when:
 - (a) determining Ancillary Service Requirements; and
 - (b) entering into Ancillary Service Contracts, including the process for conducting competitive tender processes utilised for the awarding of Ancillary Service Contracts.

. .

Clause 3.11.15 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.11.15. System Management must document in the <u>a</u> Power System Operation Procedure the procedure to be followed where the Market Rules require Ancillary Services to be provided. System Management and Rule Participants must comply with that documented Market Procedure.

..

Clause 3.16.4 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.4. Unless otherwise directed by System Management, Rule Participants must provide the following data to System Management in respect of each week in the medium term planning horizon described in clause 3.16.2 by the time specified in the Power System Operation Procedure specified in clause 3.16.10:

. . .

Clause 3.16.7 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.7. Rule Participants must provide the information System Management requests, and any other data they are aware of that might be relevant to a Medium Term PASA study, within the timeframe specified in the Power System Operation Procedure specified in clause 3.16.10.

. . .

Clause 3.16.8A is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.8A. Rule Participants must provide any additional information or clarifications requested by System Management, within the time frame specified in the Power System Operation Procedure specified in clause 3.16.10.

. . .

Clause 3.16.10 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.16.10. System Management must document the procedure it follows in conducting Medium Term PASA studies in the <u>a</u> Power System Operation Procedure and System Management must follow that documented Market Procedure when conducting a Medium Term PASA study.

Clause 3.17.10 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement

for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

3.17.10. System Management must document the procedure it follows in conducting Short Term PASA studies in—the <u>a</u> Power System Operation Procedure-and System Management must follow that documented Market Procedure when conducting a Short Term PASA study.

. . .

Clause 3.18.3 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.18.21 in subclauses (c)(i) and (ii).

3.18.3.

. .

- (c) Economic Regulation Authority may give a direction to System

 Management that a Facility or item of equipment should not remain on the list where it finds that:
 - System Management has not followed the Market Rules or the Power System Operation Procedure <u>specified in clause 3.18.21</u> in compiling the list under clause 3.18.2; and
 - ii. if the Market Rules and the Power System Operation Procedure specified in clause 3.18.21 had been followed, then the Facility or item of equipment would not have been on the list.

. . .

. . .

Clause 3.18.15 is proposed to be amended to:

- refer to the Power System Operation Procedure in (head of power) clause 3.18.21 in subclauses (a) and (f)(i) and (ii); and
- make consequential changes to the clause.
- 3.18.15. Where System Management informs a Market Participant or Network Operator that an Outage Plan has not been scheduled or has been removed from System Management's outage schedule under clause 3.18.13(d)(ii), the Market Participant or Network Operator may apply to Economic Regulation Authority to reassess the decision in accordance with the following procedures:
 - (a) A Participant or Network Operator can only apply for Economic Regulation Authority to reassess a decision on the grounds that System Management has not followed the Market Rules or its the Power System Operation Procedure specified in clause 3.18.21;

. . .



- (f) Economic Regulation Authority may give a direction to System Management that the Outage Plan should be scheduled in System Management's outage schedule where it finds that:
 - System Management has not followed the Market Rules or its the Power System Operation Procedure specified in clause 3.18.21; and
 - ii. if the Market Rules and the Power System Operation Procedure

 specified in clause 3.18.21 had been followed, then the Outage Plan
 would have been scheduled; and

. . .

. . .

Clause 3.18.21 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.18.21. System Management must document the procedure it follows in conducting outage planning in the <u>a</u> Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure when planning outages.

. . .

Clause 3.19.10 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.19.14.

3.19.10. Where a Market Participant or Network Operator has reason to believe that System Management has not followed the Market Rules or the Power System Operation Procedure specified in clause 3.19.14 in its decision to reject an outage it may report the decision to the Economic Regulation Authority as a potential breach of the Market Rules in accordance with clause 2.13.4.

. . .

Clause 3.19.14 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on

the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

3.19.14. System Management must document the procedure it follows in conducting final approval of outages in the <u>a</u> Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure when conducting final approval of outages.

. . .

Clause 3.21.12 is proposed to be amended to:

- · correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21.12. System Management must document the procedure to be followed in determining and reporting Forced Outages and Consequential Outages in the a Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure.

. . .

Clause 3.21A.15 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21A.15. System Management must document the procedure it follows in scheduling and approving Commissioning Tests in the a Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure when planning and conducting Commissioning Tests.

. .

Clause 3.21B.5 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.21B.8.

- 3.21B.5. System Management may only withhold the permission described in clause 3.21B.1 if:
 - (a) the request for that permission is not in compliance with clause 3.21B.2 or the Power System Operation Procedure specified in clause 3.21B.8; or
 - (b) granting permission would mean that System Management would be incapable of maintaining the Ready Reserve Standard.

..

Clause 3.21B.8 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21B.8. System Management must document the procedure it follows to grant permission in accordance with section 3.21B in the a Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure.

. . .

Clause 4.15.14 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.5.14. AEMO must document the procedure it follows in conducting the Long Term PASA, and which the Economic Regulation Authority must follow in conducting reviews under clause 4.5.15, in a Market Procedure. The Economic Regulation Authority and Rule Participants, including AEMO, must follow that documented Market Procedure in the conduct of the Long Term PASA study and the review under clause 4.5.15, as applicable.

. .

Clause 4.5.14B is proposed to be amended:

to improve the clarity of the drafting;

- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.5.14B. AEMO must document <u>in a Market Procedure</u> the procedure it follows in <u>calculating</u> <u>calculating</u>:
 - (a) the Expected DSM Dispatch Quantity; and
 - (b) the DSM Activation Price_-

and Rule Participants, including AEMO, must follow that documented Market Procedure.

. . .

Clause 4.5.15 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

- 4.5.15. From time to time, and at least once in every five year period starting from Energy Market Commencement, the Economic Regulation Authority must conduct a review of the Planning Criterion and the process in the Market Procedure specified in clause 4.5.14 by which AEMO forecasts SWIS peak demand. This review must include:
 - (a) a review of the technical analysis; and
 - (b) a cost-benefit study on the effects on stakeholders of a variety of levels of generation adequacy.

. . .

Clause 4.5.16 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

4.5.16. In conducting a review under clause 4.5.15, the Economic Regulation Authority must invite submissions in accordance with a the Market Procedure specified in clause 4.5.14 on the performance of the Planning Criterion and the process by which AEMO forecasts SWIS peak demand from Rule Participants and take any submissions into account in the review.

Clause 4.5.17 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

4.5.17. In accordance with-a_the Market Procedure_specified in clause 4.5.14, the Economic Regulation Authority must make available a draft of the report described

in clause 4.5.18 to Rule Participants for comment and invite submissions on the draft report.

- 4.5.18. After concluding the review described in clause 4.5.15, the Economic Regulation Authority must publish a final report containing:
 - (a) issues identified by the Economic Regulation Authority;
 - (b) assumptions made by the Economic Regulation Authority in undertaking the review;
 - (c) submissions received by the Economic Regulation Authority from Rule Participants in accordance with clause 4.5.16;
 - (d) the Economic Regulation Authority's responses to the issues raised in those submissions:
 - (e) the results of the technical and cost-benefit studies;
 - (f) the submissions on the draft report received by the Economic Regulation Authority from Rule Participants in accordance with clause 4.5.17;
 - (g) the Economic Regulation Authority's responses to the issues raised in those submissions; and
 - (h) any recommended changes to the Planning Criterion.

. . .

Clause 4.9.10 is proposed to be amended to:

- improve the clarity of the drafting; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.9.10. AEMO must document in a Market Procedure the procedure that:
 - (a) Market Participants must follow in the process of when applying for Certified Reserve Capacity; and
 - (b) AEMO must follow-in when processing applications for Certified Reserve Capacity, including how Certified Reserve Capacity is assigned and Reserve Capacity Obligation Quantities are set...

in a Market Procedure. in a Market Procedure. AEMO and Market Participants must follow that documented Market Procedure when Market Participants are applying for Certified Reserve Capacity and when AEMO is processing those applications.

Clause 4.13.8 is proposed to be amended:

- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them;
- to correct a minor drafting oversight; and
- for consistency with the current drafting style of the Market Rules.
- 4.13.8. AEMO must develop a Market Procedure dealing with:
 - (a) determining Reserve Capacity Security;
 - (b) assessing persons against the Acceptable Credit Criteria;
 - (c) Reserve Capacity Security arrangements, including:
 - the form of acceptable guarantees and bank undertakings;
 - ii. where and how it will hold cash deposits and how the costs and fees of holding cash deposits will be met;
 - iii. the application of monies drawn from Reserve Capacity Security in respect of amounts payable by the relevant Market Participant to AEMO under clause 4.13.11A; and
 - (d) other matters relating to-clauses section 4.13₇.

 and Market Participants and AEMO must comply with that Market Procedure.

. . .

Clause 4.14.11 is proposed to be amended:

- to correct a minor typographical oversight;
- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.14.11. AEMO must develop a Market Procedure documenting the process AEMO and Rule Participants must follow for the declaration under this clause section 4.14 and Reserve Capacity Auction. AEMO and Rule Participants must comply with that documented Market Procedure.

. . .

Clause 4.17.9 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or

Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.17.9. AEMO must document the Reserve Capacity Auction submission and clearing process in a Market Procedure, and AEMO and Market Participants must follow that documented Market Procedure.

. . .

Clause 4.24.18 is proposed to be amended to:

- improve the clarity of the drafting;
- to correct a minor drafting oversight; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.24.18. AEMO must document in a Market Procedure the procedures it follows in:
 - (a) acquiring Eligible Services;
 - (b) entering into Supplementary Capacity Contracts; and
 - (c) determining the maximum contract value per hour of availability for any Supplementary Capacity Contract...

in a Market Procedure, and must follow that documented Market Procedure.

. . .

Clause 4.25.14 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.25.14. AEMO must document the procedure to be followed in performing Reserve Capacity Tests in a Market Procedure., and AEMO and Market Participants must follow that documented Market Procedure in the performance of Reserve Capacity Tests.

. . .

Clause 4.25A.1 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.25.14.

4.25A.1. In each Capacity Year each Market Customer must undertake a Verification Test during the period specified in clause 4.10.1(f)(vi) for each Demand Side



Programme registered to the Market Customer. Each test must be conducted in accordance with-a the Market Procedure specified in clause 4.25.14 and be carried out:

- (a) within 20 Business Days of registration, as notified by AEMO under clause 2.31.6, of the Demand Side Programme, if applicable; or
- (b) between 1 October and 30 November.

. . .

Clause 4.27.12 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.27.12. AEMO must document the procedure to be followed in performing Reserve Capacity monitoring in a Market Procedure, and AEMO and Market Participants must follow that documented Market Procedure in the performance of Reserve Capacity monitoring. Amongst other things, the Market Procedure must list the documents and other items that may be required by AEMO as supporting evidence in accordance with clause 4.27.11D.

. . .

Clause 4.28A.3 is proposed to be amended to:

- · correct a minor typographical oversight; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.28A.3. AEMO must document the procedure AEMO must follow in calculating Intermittent Load Refunds in a Market Procedure, and AEMO must follow that documented Market Procedure when calculating Intermittent Load Refunds.

. .

Clause 4.28B.9 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.



4.28B.9. AEMO must document the process for applying for and approving Capacity Credits in accordance with this <u>clause section</u> 4.28B in a Market Procedure., and AEMO and Market Participants must follow that documented Market Procedure.

. . .

Clause 4.28C.15 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.28C.15. AEMO must document the process for applying for and approving Capacity Credits in accordance with this <u>clause section</u> 4.28C in a Market Procedure. and Market Participants must follow that documented Market Procedure.

. . .

Clause 6.17.6F is proposed to be amended to:

- improve the clarity of the drafting;
- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 6.17.6F. AEMO must document <u>in a Market Procedure</u> the procedure it follows-in <u>when</u> making the adjustment referred to in clause 6.17.6E., and Rule Participants, including AEMO, must follow the documented Market Procedure.

. . .

Clause 6.19.6 is proposed to be amended to delete the name of the Market Procedure (Contingency Market Procedure) in subclause (f), and instead refer to the Market Procedure specified in (head of power) clause 6.19.10.

- 6.19.6. A Market Advisory must contain the following information:
 - ..
 - (f) any actions Market Participants or Network Operators are required to take in response to the situation, including whether any Contingency Market Procedure specified in clause 6.19.10 is applicable; and

. . .

Clause 6.19.10 is proposed to be amended to delete the name of the Market Procedure (Contingency Market Procedure).

- 6.19.10. AEMO may create one or more—Contingency Market Procedures to deal with contingencies, and:
 - (a) Market Participants must follow that documented Market Procedure after receiving a relevant Market Advisory; and
 - (b) AEMO must follow that documented Market Procedure after AEMO has issued a relevant Market Advisory.

. . .

Clause 7.2.5 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.2.5. Unless otherwise directed by System Management, each Market Generator must by 10 AM each day provide to System Management for each of its Intermittent Generators with capacity exceeding 10 MW its most current forecast of the MWh energy output of the Intermittent Generator for each Trading Interval between noon of the current Scheduling Day and the end of the corresponding Trading Day in a format and by a method specified in the a Power System Operation Procedure.

. . .

Clause 7.6.13 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.6.13. System Management must document in the a Power System Operation Procedure the procedure to be followed, and must follow that documented Market Procedure, when scheduling and issuing Operating Instructions to dispatch Registered Facilities covered by any Ancillary Service Contract in a form sufficient for audits and investigations under these Market Rules.

. . .

Clause 7.6A.7 is proposed to be amended:

for consistency with the current drafting style of the Market Rules;

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.6A.7. Subject to clause 7.6A.8, System Management must document the procedures System Management and Synergy must follow to comply with this-clause section 7.6A, including the process to follow in developing the confidential procedure described in clause 7.6A.8, in-the_a Power System Operation Procedure, and System Management and Synergy must follow that documented Market Procedure.

Clause 7.6A.8 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- to refer to the Power System Operation Procedure in (head of power) clause 7.6A.7.
- 7.6A.8. Any procedure created or data exchanged in accordance with this <u>clause section</u> 7.6A which is commercially sensitive information of Synergy must not be included in the Power System Operation Procedure <u>specified in clause 7.6A.7</u>. Instead, such information must be included in a confidential procedure developed by System Management in consultation with Synergy.

. . .

Clause 7.6A.10 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 7.6A.7.

7.6A.10. AEMO may only decline to approve the confidential procedure, or an amendment to that procedure, if that document is inconsistent with the Market Rules or the market objectives or if it contains material which, in the reasonable view of AEMO, should be in the Power System Operation Procedure specified in clause 7.6A.7.

. . .

Clause 7.7.4A reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.7.4A. When selecting Demand Side Programmes from the Non-Balancing Dispatch Merit Order, and subject to 7.6.1C and 7.6.1E, System Management must select them in

accordance with the a Power System Operation Procedure. The selection process specified in the Power System Operation Procedure must:

(a) only discriminate between Demand Side Programmes based on response time and availability;

. . .

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Clause 7.7.5A is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

7.7.5A. System Management must develop a Power System Operation Procedure specifying:

. . .

(d) for the purposes of clause 7.13.1C(e) – one or more methods that may be used to estimate the decrease in the output (in MWh) of each of Synergy's Non-Scheduled Generators as a result of an instruction from System Management to deviate from the Dispatch Plan or change their commitment or output in accordance with clause 7.6A.3(a).

System Management and Market Participants must comply with the Power System Operation Procedure.

Clause 7.7.5B is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.7.5B. The quantity to be used for the purposes of clauses 6.15.2(b)(i) and 7.13.1(eF) is System Management's estimate, determined in accordance with the a Power System Operation Procedure, of the maximum amount of sent out energy, in MWh, which each Non-Scheduled Generator, by Trading Interval, would have generated in the Trading Interval had a Dispatch Instruction not been issued.

. . .

Clause 7.7.6 is proposed to be amended to:

- in subclause (a), to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- in subclause (b), refer to the Power System Operation Procedure in (head of power) clause 7.7.6(a).
- 7.7.6. Subject to clause 7.7.7:



- (a) and clause 7.7.7A, System Management must issue a Dispatch Instruction or an Operating Instruction by communicating it to the relevant Market Participant in accordance with the a Power System Operation Procedure. System Management must develop a Power System Operation Procedure which prescribes a communication method or methods which allow sufficient time for the Market Participant to confirm and to respond to that Dispatch Instruction; and
- (b) a Market Participant must:
 - confirm receipt of the Dispatch Instruction or Operating Instruction;
 and
 - ii. advise if it cannot comply or cannot fully comply with the Dispatch Instruction or Operating Instruction.

The advice and confirmation under this clause 7.7.6 must be made in the time and manner set out in the Power System Operation Procedure specified in clause 7.7.6(a).

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Clause 7.9.19 is proposed to be amended to delete the name of the Market Procedure (Dispatch).

- 7.9.19. System Management must document in the a Power System Operation Procedure for Dispatch the processes to be used:
 - (a) for applications under clause 7.9.13;
 - (b) by System Management in determining whether or not to grant an exemption under clause 7.9.14;
 - (c) by System Management in determining whether or not to revoke an exemption under clause 7.9.17;
 - (d) for notification of any exemptions granted or revoked by System Management; and
 - (e) publishing and maintaining on System Management's website any information and details with respect to any exemptions.

. .

Clause 7.10.4 is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

7.10.4. System Management must monitor the behaviour of Market Participants with Registered Facilities to assess whether they are complying with clause 7.10.1 in accordance with its Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A.

Clause 7.13.1(eD) is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.13.1. System Management must prepare the following data for a Trading Day by noon on the first Business Day following the day on which the Trading Day ends:

. . .

(eD) by Trading Interval, the Load Rejection Reserve Response Quantity and the Spinning Reserve Response Quantity calculated in accordance with the a Power System Operation Procedure;

. . .

. . .

Clause 7.13.3 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.13.3. System Management must document in the a Power System Operation Procedure the procedure to be followed by Rule Participants in providing settlement and monitoring data to AEMO. Rule Participants must comply with that documented Market Procedure.

. . .

Clause 7A.1.6 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to:

- delete the name of the Market Procedure (Balancing Facility Requirements Market Procedure); and
- to improve the clarity of the drafting.
- 7A.1.6. AEMO must develop a Balancing Facility Requirements specify the following matters in a Market Procedure specifying:
 - (a) <u>the</u> technical and communication criteria that a Balancing Facility, (or a type of Balancing Facility), must meet, including:
 - Facility quantity parameters and limits for participation in the Balancing Market;



ii. the manner and forms of communication to be used while participating in the Balancing Market, including when receiving Dispatch Instructions; and

. . .

.

...

Clause 7A.3.1 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (d), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

7A.3.1. AEMO must, to the extent that it is reasonably able, as soon as practicable during the first 15 minutes of each Trading Interval, for each future Trading Interval in the Balancing Horizon:

. . .

(d) if AEMO has sufficient information available to it, determine the Balancing Forecast in accordance with the Balancing Forecast Market Procedure specified in clause 7A.3.3 and publish it on the Market Web Site.

Clause 7A.3.2 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (c), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

7A.3.2. AEMO must determine a Forecast BMO for a Trading Interval for the purposes of clause 7A.3.1(a) by:

_ _ _

(c) where there is a tie in the ranking of Balancing Facilities under clause 7A.3.2(b), breaking the tie in accordance with the Balancing Forecast Market Procedure specified in clause 7A.3.3; and

- - -

Clause 7A.3.3 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure).

- 7A.3.3. AEMO must document in the Balancing Forecast a Market Procedure the processes it must follow when:
 - (a) determining Forecast BMOs and providing them to System Management;
 - (b) preparing and publishing Balancing Forecasts; and
 - (c) assigning priority to Facilities in the case where there is a tie in a Forecast BMO or Forecast LFAS Merit Order.

Clause 7A.3.4 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

- 7A.3.4. AEMO must develop the Balancing Forecast Market Procedure specified in clause 7A.3.3 in accordance with the following principles:
 - to the extent reasonably practicable, Balancing Forecasts must use the latest information available to AEMO; and
 - (b) Balancing Forecasts must provide Market Participants with information upon which to make an assessment regarding their Balancing Submissions and whether to update a Balancing Submission.

. . .

Clause 7A.3.7 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7A.3.7. System Management must, no later than two hours after the end of the Trading Day, prepare an estimate of:
 - (a) the SOI Quantity and the EOI Quantity for each Balancing Facility; and
 - (b) the Relevant Dispatch Quantity,

for each Trading Interval in the Trading Day, determined in accordance with the a Power System Operation Procedure.

Clause 7A.3.7A is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7A.3.7A. System Management must make reasonable endeavours to prepare, no later than five minutes after the end of each Trading Interval, an estimate of:
 - (a) the SOI Quantity and the EOI Quantity for each Balancing Facility; and
 - (b) the Relevant Dispatch Quantity,

for that Trading Interval, determined in accordance with the <u>a</u> Power System Operation Procedure.

. . .

Clause 7A.3.15 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7A.3.15. System Management must, for each future Trading Interval in the Balancing Horizon, prepare a forecast of the Relevant Dispatch Quantity, and may prepare a

forecast of the EOI Quantity for Non-Scheduled Generators, each determined in accordance with-the <u>a</u> Power System Operation Procedure. -System Management must, each time it has new information on which to determine these quantities, update these forecasts, but is not required to do so more than once per Trading Interval.

. . .

Clause 7B.1.2 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7B.1.2. System Management must, in the <u>a</u> Power System Operation Procedure, specify any technical and communication criteria that an LFAS Facility, or a type of LFAS Facility, must meet, including:
 - (a) Facility quantity parameters and limits in providing LFAS, including the Minimum LFAS Quantity;
 - (b) the manner and forms of communication to be used in providing LFAS, including how LFAS Facilities which are Non-Scheduled Generators, are to be activated; and
 - (c) the nature and type of any enablement and quantity restrictions that will apply.

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Clause 7B.1.4 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7B.1.4. System Management must, by 12:00 PM on the Scheduling Day, determine the Forecast Upwards LFAS Quantity and the Forecast Downwards LFAS Quantity for each Trading Interval in the next Trading Day in accordance with-the <u>a</u> Power System Operation Procedure.

. . .

Clause 7B.3.2 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to:

- reflect the intent of the proposed changes to clause 7B.3.3 in the initial proposed Amending Rules;
- delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (c), and instead refer to the Market Procedure in (head of power) clause 7A.3.3; and

improve the clarity of the drafting in subclause (c).

7B.3.2. AEMO must:

. . .

(c) in circumstances where if there is a tie in the ranking of LFAS Facilities in the LFAS Merit Order under clauses 7B.3.2(a) or 7B.3.2(b) in an LFAS Merit Order, then AEMO must break the tie for the Trading Interval in which the tie occurred in accordance with the Balance Forecast Market Procedure specified in clause 7A.3.3.

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The Rule Change Panel intends to reject the proposed deletion of clause 8.6.2 in the Rule Change Proposal, but proposes to amend the clause to delete the name of the Market Procedure (Settlement Market Procedure), and to improve the clarity of the drafting.

8.6.2. AEMO must document:

- (a) the format of Meter Data Submissions;
- (b) [Blank]

in the Settlement a Market Procedure, and Metering Data Agents must comply with that documented Market Procedure when developing and submitting Meter Data Submissions.

. . .

The section 9.2 heading is proposed to be amended to delete the name of the Market Procedure (Settlement Procedure).

9.2. Settlement Process Procedure

Clause 9.2.1 is proposed to be amended to:

- delete the name of the Market Procedure (Settlement Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 9.2.1. AEMO must document the settlement process, including the application of taxes and interest, in the <u>a Settlement Market Procedure</u>, and AEMO and Market Participants must follow that documented Market Procedure.

. . .

Clause 9.4.18 reflects the clause as it appears in the Amending Rules RC_2017_06 that will commence on 1 June 2019, and subclause (b) is proposed to be amended to correct a minor typographical error.

- 9.4.18. AEMO must develop a Market Procedure dealing with:
 - (a) Capacity Credit Allocations; and



(b) other matters relating to sections 9.4_7 and 9.5.

- -

Clause 9.20.1 is proposed to be amended to delete the name of the Market Procedure (Settlement Procedure), and instead refer to the Market Procedure in (head of power) clause 9.2.1.

9.20.1. A Notice of Disagreement must be submitted to AEMO in accordance with the Settlement Market Procedure specified in clause 9.2.1.

. . .

Clause 10.2.7 is proposed to be amended:

- to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate);
- for consistency with the current drafting style of the Market Rules;
- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them; and
- to improve the clarity of the drafting.
- 10.2.7 AEMO must document the <u>in a Market Procedure the process</u> it follows in setting and publishing the confidentiality status of information in <u>clause section</u> 10.2. AEMO must comply with that documented Market Procedure.

11. Glossary

...

The Glossary definition of "Administration Procedure" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Administration Procedure: The Market Procedure developed by the Rule Change Panel in accordance with clause 2.9.5.

. . .

The Glossary definition of "Balancing Forecast" is proposed to be amended to:

- improve the clarity of the drafting; and
- delete the name of the Market Procedure (Balancing Forecast Market Procedure), and instead refer to the Market Procedure in (head of power) clause 7A.3.3.



Balancing Forecast: Means, with respect to a Trading Interval, AEMO's a forecast of each of the following matters, (as determined by AEMO in accordance with the Balancing Forecast Market Procedure specified in clause 7A.3.3): for a Trading Interval, of the following

- (a) the Relevant Dispatch Quantity for the Trading Interval;
- (b) the aggregate output of all Non-Scheduled Generators which are Balancing Facilities for the Trading Interval;
- (c) the Balancing Price for the Trading Interval; and
- (d) the spare capacity for the Trading Interval.

. . .

The Glossary definition of "Balancing Forecast Market Procedure" reflects the Amending Rules RC_2017_06 that will commence on 1 June 2019, and is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Balancing Forecast Market Procedure: Means the Market Procedure developed under clauses 7A.3.3 and 7A.3.4.

. . .

The Glossary definition of "Equivalent Planned Outage Hours" is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.21.12.

Equivalent Planned Outage Hours: Means, in respect of a Facility, the sum of the "Planned Outage Hours" and the "Equivalent Planned Derated Hours" for the Facility as calculated in accordance with the Power System Operation Procedure specified in clause 3.21.12.

. - -

The Glossary definition of "IMS Interface Market Procedure" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

IMS Interface Market Procedure: Means the Market Procedure developed under clause 2.36A.1.

. . .

The Glossary definition of "Monitoring and Reporting Protocol" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Monitoring and Reporting Protocol: The Market Procedure developed by AEMO and approved by the Economic Regulation Authority in accordance with clause 2.15.6A.



The Glossary definition of "Monitoring Protocol" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Monitoring Protocol: The Market Procedure maintained by the Economic Regulation Authority in accordance with clause 2.15.1.

. . .

Appendix 9: Relevant Level Determination

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Appendix 9 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 7.7.5A at Step 4(a)(i).

Step 4: For each Candidate Facility and Trading Interval identified in step 3(a):

- (a) identify the actual quantity as determined in step 2 if:
 - i. System Management has made a revised estimate of the maximum quantity in accordance with clause 7.7.5A(c) and the Power System Operation Procedure specified in clause 7.7.5A; and
 - ii. the revised estimate of the maximum quantity is lower than the actual quantity as determined in step 2;

...

Appendix A. Responses to Submissions Received During the Further Submission Period

Issue	Submitter	Comment/Issue Raised	Rule Change Panel's Response
1	Alinta	Alinta notes that given there are 43 Market Procedures maintained by either the Rule Change Panel, the ERA or AEMO, including 15 Power System Operation Procedures, Alinta's preference is for all Market Procedures and Power System Operation Procedures to be named in market rules. Alinta considers that this will improve the clarity and understandability of the WEM arrangements for both existing and new participants.	Please refer to section 5.1.1 of this Draft Rule Change Report.
2	Synergy	Synergy supports the proposed amendments to the head of power clause for the Balancing Forecast Market Procedure that would require AEMO to document the processes involved in developing Balancing Forecasts. Transparency of these processes will be increasingly important as WA's electricity industry continues to evolve, and key inputs in the Balancing Forecasts – on both the supply and demand side of the equation – change significantly. Improved transparency will help market participants understand how the market operator's forecasting methods adapt to and are limited by these changes. As follows, Synergy considers that it would be beneficial if AEMO is required to document (in the Market Procedure) how its Balancing Forecast processes will deal with key inputs which are particularly prone to change, including load forecasts and ramp rates. Load is a crucial determinant in the Balancing Forecast and increasingly difficult to predict with the rise of rooftop solar. Similarly, ramp rates are likely to become more	The Amending Rules in RC_2014_06 that will commence on 1 July 2019 introduces a new head of power clause 7A.3.3 which describes the processes that AEMO must document in a Market Procedure. Therefore, proposed new clause 7A.3.19A is no longer required. Please refer to section 5.1.5 of this Draft Rule Change Report. However, the Rule Change Panel notes Synergy's preference for AEMO to document in the Market Procedure how its Balancing Forecast processes will deal with key inputs, which are particularly prone to change, including load forecasts and ramp rates. The Rule Change Panel considers that this level of prescription is too detailed for the Market Rules and that the head of power in clause 7A.3.3 is sufficiently broad for that matter to be dealt with via the Procedure Change Process.

		dynamic with the growing need to balance increasingly variable load and intermittent generation; and if Synergy gains the ability to vary its ramp rates on a facility basis as a result of the proposed facility bidding reforms. AEMO documenting how it forecasts load and accounts for changing ramp rates in the Market Procedure will therefore be important in helping market participants better understand the limitations of Balancing Forecasts in WA's increasingly dynamic market; and how AEMO adapts its forecasting methods in response to these changes.	
3	Synergy	Synergy expresses its opinion that the explanation in the textbox above clause 7A.3.19A does not appear to align with the proposed change – i.e., the change does not appear to be required to 'reflect the transfer of functions from the IMO to AEMO'. Synergy suggests that a more specific explanation for the inclusion of additional matters in the Market Procedures would assist the future interpretation of the clause.	The Rule Change Panel notes that the purpose of the explanation in the comment box for clause 7A.3.19A in the call for further submissions is to explain the reason for any proposed changes by the Rule Change Panel to the clause in the initial proposed Amending Rules in the Rule Change Proposal. The Rule Change Proposal states that the current head of power clause does not provide information about the processes that should be included in the Market Procedure. Therefore, it is proposed to introduce a new clause 7A.3.19A of the Market Rules to specify what processes should be documented in the Balancing Market Forecast Market Procedure. However, the matters proposed to be dealt with in clause 7A.3.19A are now dealt with in clause 7A.3.3. Please refer to section 5.1.5 of this Draft Rule Change Report.
4	Synergy	Synergy suggests that the proposed change to clause 7A.3.21 may be improved if it is reformed to clarify that	Clause 7A.3.21 has been deleted by the Amending Rules in RC_2014_06 that will commence on 1 July 2019.

AEMO is required to publish a new Balancing Forecast each Trading Interval each day, rather than at 6PM on the Balancing Market Commencement Day (i.e. 1 July 2012). Synergy proposes the following alternative drafting:

"AEMO must, to the extent it is reasonably able within the each Trading Interval, commencing at 6:00PM..."

Therefore, Synergy's suggested amendment is no longer applicable. Please also refer to section 5.1.5 of this Draft Rule Change Report.

Appendix B. Further Amendments to the Proposed Amending Rules

The Rule Change Panel proposes to make some further amendments to the proposed Amending Rules following the further consultation period to the call for further submissions. These changes are as follows (deleted text, added text):

Clause 1.14.1 is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring and Reporting Protocol) in subclause (e), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.
- 1.14.1. On and from the AEMO Transition—Date—Date:

. . .

(e) until the date on which a Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A developed by AEMO is approved by the Economic Regulation Authority under clause 2.15.6A 2.15.6A:

...

...

Clause 1.16.1 is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring and Reporting Protocol) in subclause (e), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.
- 1.16.1. On and from the System Management Transition <u>Date</u> <u>Date</u>:

. . .

(e) AEMO may amend its Monitoring and Reporting Protocol the Market <u>Procedure specified in clause 2.15.6A</u> to incorporate its System Management Functions, and until it is amended—amended:

...

. . .

. . .

Clause 1.17.1 is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring Protocol) in subclause (d); and
- for consistency with the current drafting style of the Market Rules.

1.17.1. On and from the ERA Transfer—Date—Date:

. . .

(d) where the Economic Regulation Authority is required to develop or maintain a Market Procedure (including the Monitoring Protocol Market Procedure that is required to be maintained in accordance with clause 2.15.1), and that Market Procedure was developed or maintained by the IMO prior to the ERA Transfer Date, then then:

...

. . .

...

Clause 1.18.2 is proposed to be amended:

- to delete the name of the Market Procedure (Administration Procedure) in subclauses (a) to (e) (inclusive), and instead, where applicable, refer to the Market Procedure specified in (head of power) clause 2.9.5; and
- for consistency with the current drafting style of the Market Rules.

1.18.2. On and from the Rule Change Panel Transfer Date—Date:

- (a) any-Administration Market Procedure developed by AEMO under clause 2.9.5 prior to the Rule Change Panel Transfer Date is deemed to have been developed by the Rule Change Panel in accordance with clause 2.9.5;
- (b) any reference to AEMO in the <u>Administration Market</u> Procedure <u>specified in clause 2.9.5</u> that should be a reference to the Rule Change Panel having regard to the Rule Change Panel's functions, powers, rights and obligations under these Market Rules and the Market Procedures is deemed to be a reference to the Rule Change Panel;
- the Rule Change Panel may amend the <u>Administration Market</u> Procedure specified in clause 2.9.5 to refer to the Rule Change Panel instead of AEMO (where appropriate) and make any necessary consequential amendments without undertaking the Procedure Change Process;
- (d) the Administration Market Procedure which is amended by the Rule Change Panel in accordance with this clause 1.18.2 may commence operation on the date and time determined by the Rule Change Panel and published on the Market Web Site; and
- (e) notwithstanding the operation of this clause 1.18.2, the Rule Change Panel is not liable for any act, matter or thing done by AEMO prior to the Rule Change Panel Transfer Date in breach of these Market Rules or any Market Procedure (including the Administration Procedure).

Clause 2.2.2 is proposed to be amended to delete the name of the Market Procedure (IMS Interface Procedure) in subclause (c).

2.2.2. The other functions of System Management in relation to the Wholesale Electricity Market are:

. . .

 to develop Market Procedures relevant to System Management (including the Power System Operation Procedures-and the IMS Interface Procedure), and amendments and replacements for them, where required by these Market Rules;

. . .

...

Proposed new clauses 2.9.2D and 2.9.2E require AEMO to publish and maintain a list of all Market Procedures and Power System Operation Procedures on the Market Web Site, together with other information that will enable Market Participants to readily identify the Market Procedures or Power System Operation Procedures in which obligations, processes or requirements in the Market Rules are documented.

- 2.9.2D. AEMO must develop and maintain on the Market Web Site a list of all Market Procedures and Power System Operation Procedures. For each Market Procedure and Power System Operation Procedure the list must:
 - (a) <u>state the name of the Market Procedure or Power System Operation</u>
 Procedure;
 - (b) give a brief description of the Market Procedure or Power System
 Operation Procedure; and
 - (c) specify:
 - i. <u>each head of power clause in the Market Rules pursuant to which</u> the Market Procedure or Power System Operation Procedure has been developed; and
 - ii. if not already covered under clause 2.9.2D(c)(i), each clause in the Market Rules which requires that an obligation, process or requirement be documented in a Market Procedure or Power System Operation Procedure, that has been documented in that Market Procedure or Power System Operation Procedure.
- 2.9.2E. AEMO must maintain and keep up to date the list referred to in clause 2.9.2D.



Clause 2.9.5 is proposed to be amended to:

- delete the name of the Market Procedure (Administration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.9.5. The Rule Change Panel must develop an a Market Administration Procedure setting out the procedure for developing and amending Market Procedures. and:
 - (a) AEMO must follow the Administration that Market Procedure when developing and approving Procedure Change Proposals;
 - (b) System Management must follow the Administration that Market Procedure when developing Procedure Change Proposals;
 - (bA) the Economic Regulation Authority must follow the Administration that Market Procedure when developing Procedure Change Proposals;
 - (bB) the Rule Change Panel must follow the Administration that Market Procedure when developing Procedure Change Proposals; and
 - (c) Rule Participants involved in the Procedure Change process must follow the Administration that Market Procedure when assisting the Rule Change Panel, AEMO or System Management to develop Procedure Change Proposals.

..

Clause 2.11.1 is proposed to be amended to delete the name of the Market Procedure (Administration Procedure), and instead refer to the Market Procedure specified in (head of power) clause 2.9.5.

2.11.1. A Rule Participant may apply to the Electricity Review Board for a Procedural Review of a decision by the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority, as applicable, contemplated by clauses 2.10.2A(a) or 2.10.13 within the time specified in regulation 44 of the WEM Regulations, on the grounds that the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority, as applicable, has not followed the process set out in section 2.10 or the <u>Administration Market</u> Procedure <u>specified in clause 2.9.5</u>.

Clause 2.11.2 is proposed to be amended to delete the name of the Market Procedure (Administration Procedure), and instead refer to the Market Procedure specified in (head of power) clause 2.9.5.

2.11.2. Following an application for a Procedural Review under clause 2.11.1, if the Electricity Review Board finds that the Rule Change Panel, AEMO, System

Management or the Economic Regulation Authority has not followed the process set out in section 2.10 or the <u>Administration Market Procedure specified in clause 2.9.5</u>, the Electricity Review Board may set aside the Rule Change Panel's decision, AEMO's decision, System Management's decision or Economic Regulation Authority's decision and direct the Rule Change Panel, AEMO, System Management or the Economic Regulation Authority to reconsider the relevant Procedure Change Proposal in accordance with section 2.10 and the <u>Administration Market</u> Procedure <u>specified in clause 2.9.5</u>.

. . .

Clause 2.13.2 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.13.2. The Economic Regulation Authority must monitor other Rule Participants' behaviour (including AEMO's and System Management's behaviour) for compliance with the Market Rules and Market Procedures in accordance with the Monitoring Protocol Market Procedure specified in clause 2.15.1.

Clause 2.13.3 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.13.3. The Economic Regulation Authority must ensure it has processes and systems in place to allow it to monitor Rule Participants' behaviour for compliance with the Market Rules and Market Procedures in accordance with the Monitoring Protocol Market Procedure specified in clause 2.15.1.

- - -

Clause 2.13.6A is proposed to be amended to:

- correct a minor typographical oversight; and
- delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.
- 2.13.6A. Subject to clause 2.13.6B, System Management must report any alleged breaches of the provisions of the Market Rules referred to in clause 2.13.9 or the Power System Operation Procedures to the Economic Regulation Authority in accordance with the Monitoring and Reporting Protocol Market Procedure specified in clause 2.15.6A developed by AEMO.

. . .

Clause 2.13.6K is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.13.6K. System Management must document the procedure for determining and reviewing the annual Tolerance Range and any Facility Tolerance Ranges in the <u>a</u> Power System Operation Procedure, and System Management and Market Participants must follow that documented Power System Operation Procedure.

. . .

Clause 2.13.9C is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

2.13.9C. If AEMO becomes aware of an alleged breach of the Market Rules (other than a provision of the Market Rules referred to in clause 2.13.9) or the Market Procedures developed by AEMO then it must notify the Economic Regulation Authority in accordance with the Monitoring and Reporting Protocol Market Procedure specified in clause 2.15.6A developed by AEMO.

. . .

The section 2.15 heading is proposed to be amended for consistency with the intent of the Rule Change Proposal to delete the name of Market Procedures (including Power System Operation Procedures).

2.15. Monitoring and Reporting Protocols Requirements

Clause 2.15.1 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol).

2.15.1. The Economic Regulation Authority must maintain and implement a monitoring protocol in a Monitoring Protocol Market Procedure.

Clause 2.15.2 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

2.15.2. The purpose of the Monitoring Protocol Market Procedure specified in clause 2.15.1 is to state how the Economic Regulation Authority will implement its

obligations under these Market Rules to monitor Rule Participants' behaviour for compliance with the Market Rules and Market Procedures.

Clause 2.15.3 is proposed to be amended to delete the name of the Market Procedure (Monitoring Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.1.

- 2.15.3. The Monitoring Protocol Market Procedure specified in clause 2.15.1 must specify:
 - the Economic Regulation Authority's monitoring processes for assessing compliance with the Market Rules and Market Procedures by Rule Participants;

. . .

- - -

Clause 2.15.6A is proposed to be amended to:

- delete the name of the Market Procedure (Monitoring and Reporting Protocol); and
- make consequential changes to the clause.
- 2.15.6A. AEMO must develop and implement a <u>Monitoring monitoring and Reporting reporting Protocol in a Market Procedure</u> and seek the approval of the Economic Regulation Authority for that <u>Monitoring and Reporting Protocol Market Procedure</u>.

Clause 2.15.6B is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

2.15.6B. The purpose of AEMO's Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A is to state how AEMO (including in its capacity as System Management) will implement its obligations under these Market Rules to support the Economic Regulation Authority 's monitoring of Rule Participants' behaviour for compliance with the Market Rules in accordance with clauses 2.13.9A and 2.13.6, and with Market Procedures (including the Power System Operation Procedures) developed by AEMO.

Clause 2.15.6C is proposed to be amended:

- to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A; and
- for consistency with the current drafting style of the Market Rules.
- 2.15.6C. The Market Procedure specified in clause 2.15.6A must specify: AEMO's Monitoring and Reporting Protocol must specify—



(a) AEMO's processes (including in its capacity as System Management) for assisting the Economic Regulation Authority in monitoring and assessing compliance with the Market Rules and Market Procedures by Market Participants; and

...

. . .

Clause 2.15.7 is proposed to be deleted as the proposed amendments to clauses 2.15.1 and 2.15.6A make it clear that the protocols referred to in those clauses are Market Procedures, and the Market Rules prescribe a process for the development and amendment of Market Procedures.

2.15.7. [Blank] The Monitoring Protocol maintained by the Economic Regulation Authority and the Monitoring and Reporting Protocol developed by AEMO, are Market Procedures under these Market Rules, and must be developed and amended in accordance with clauses 2.9 and 2.10.

. . .

Clause 2.27.6 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

2.27.6. Each year by 1 June each Network Operator must, in accordance with the Market Procedure <u>specified in clause 2.27.17</u>for <u>Determining Loss Factors</u>, recalculate the Loss Factors for its connection points and provide AEMO with updated Transmission Loss Factors and Distribution Loss Factors (as applicable) for each Loss Factor Class in the Network Operator's classification system.

. . .

Clause 2.27.10 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors) in subclause (a), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

- 2.27.10. A Network Operator must develop new Loss Factor Classes if required to implement the classification system prescribed by AEMO for that Network Operator. If a Network Operator develops a new Loss Factor Class then it must:
 - (a) calculate the initial Transmission Loss Factor or Distribution Loss Factor

 (as applicable) for the new Loss Factor Class in accordance with the
 Market Procedure <u>specified in clause 2.27.17</u> for <u>Determining Loss Factors</u>;
 and

.

Clause 2.27.15 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors) in subclauses (a) and (b), and instead refer to the Market Procedure specified in (head of power) clause 2.27.17.

- 2.27.15. A Market Participant may apply to AEMO for a reassessment of any Transmission Loss Factor or Distribution Loss Factor applying to a Scheduled Generator, Non-Scheduled Generator, Interruptible Load or Non-Dispatchable Load registered to that Market Participant. The following requirements apply to each application for reassessment:
 - (a) The Market Participant must apply for reassessment in accordance with the Market Procedure specified in clause 2.27.17for Determining Loss Factors.
 - (b) AEMO must process an application for reassessment and where required conduct an audit of the relevant Loss Factor calculation in accordance with the Market Procedure <u>specified in clause 2.27.17</u> for <u>Determining Loss</u> <u>Factors</u>.

. . .

. . .

Clause 2.27.17 is proposed to be amended to delete the name of the Market Procedure (Determining Loss Factors).

2.27.17. AEMO must, with the assistance of Network Operators, document the standards, methodologies, classification systems and procedures to be used in determining Loss Factors in the a Market Procedure for Determining Loss Factors.

Clause 2.30.11 is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.30.11. AEMO must document the facility aggregation and disaggregation process in the Registration a Market Procedure, and:
 - (a) applicants for facility aggregation or disaggregation must follow that documented Market Procedure; and
 - (b) AEMO must follow that documented Market Procedure when processing applications for facility aggregation and disaggregating previously aggregated facilities.



. . .

Clause 2.30A.6 reflects the clause as it appears in the Amending Rules RC_2014_07 that will commence on 1 July 2019, and is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.30A.6. AEMO must document the Spinning Reserve costs exemption process in the Registration a Market Procedure., and:
 - (a) applicants for exemption from Spinning Reserve costs must follow that documented Market Procedure; and
 - (b) AEMO must follow that documented Market Procedure when processing applications for exemption from Spinning Reserve cost funding.

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Clause 2.31.23 is proposed to be amended to:

- delete the name of the Market Procedure (Registration Procedure); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them; and
- make consequential changes to the clause.
- 2.31.23. AEMO must document the registration, de-registration and transfer process in the Registration a Market Procedure, and:
 - applicants to register or de-register as a Rule Participant in a particular class must follow the documented Market Procedure applicable to that class; and
 - (b) applicants to register, de-register, or transfer a Facility in a particular Facility Class must follow the documented Market Procedure applicable to that class.; and
 - (c) [Blank]
 - (d) AEMO must follow that documented Market Procedure when processing applications for Rule Participant registration or de-registration, or for registration, de-registration or transfer of a facility.

. .

Clause 2.35.4 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market
 Procedure (or Power System Operation Procedure) (as appropriate), and a reference to
 the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 2.35.4. System Management must document the communications and control system requirements necessary to support the dispatch process described in these Market Rules in-the a Power System Operation Procedure.—System Management, Market Participants and Network Operators must comply with that documented Market Procedure in respect of communication and control system requirements.

. . .

Clause 2.36.5 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

2.36.5. AEMO must document the data and IT interface requirements, including security standards required for Market Participants to operate in the Wholesale Electricity Market in the relevant procedure to which the system pertains and AEMO and Market Participants must comply with that documented Market Procedure in respect of data and IT interface requirements.

Clause 2.36A.1 is proposed to be amended:

- to delete the name of the Market Procedure (IMS Interface Market Procedure); and
- for consistency with the current drafting style of the Market Rules.
- 2.36A.1. System Management must develop an IMS Interface a Market Procedure prescribing the reasonable arrangement by which Network Operators and AEMO must, subject to clause 2.36A.2, provide each other with information under these Market Rules, including including:
 - (a) the format, form and manner in which that information must be provided; and
 - (b) where the Market Rules do not provide a timeframe for the provision of the information, the time by which such information must be provided.



Clause 2.36A.2 is proposed to be amended:

- to delete the name of the Market Procedure (IMS Interface Market Procedure) in the first paragraph and subclauses (a), (c) and (e), and instead refer to the Market Procedure to be documented under (head of power) clause 2.36A.1 (as applicable); and
- for consistency with the current drafting style of the Market Rules.
- 2.36A.2. Where the IMS Interface-Market Procedure specified in clause 2.36A.1 is inadequate to enable either System Management or a Network Operator to comply with an obligation to provide information to the other under these Market Rules, and such information is required in a timely manner for the efficient performance of System Management's functions, then the following process applies until such time as the IMS Interface-Market Procedure is amended to correct the inadequacy—inadequacy:
 - (a) a senior manager from each of System Management and the Network
 Operator must meet as soon as possible after the inadequacy in the IMS
 Interface Market Procedure is identified and seek to agree an amendment
 to the IMS Interface Market Procedure that addresses the inadequacy and
 which is consistent with these Market Rules;

. . .

(c) if no agreement is reached under clause 2.36A.2(a), then System Management and the Network Operator must meet as soon as possible and seek to agree an amendment to the IMS Interface-Market Procedure that addresses the inadequacy and which is consistent with these Market Rules, and develop a Procedure Change Proposal accordingly;

. . .

(e) if no agreement is reached under clause 2.36A.2(c) within five Business Days of the first meeting, then System Management, acting reasonably, must, as soon as practicable, develop and draft a Procedure Change Proposal seeking an amendment to the IMS Interface Market Procedure that addresses the inadequacy and which is consistent with these Market Rules.

. . .

Clause 2.36A.5 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement

for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

2.36A.5. System Management must document in the a Power System Operation Procedure the communications and control system requirements necessary to enable it to remotely monitor the performance of a Network described in these Market Rules. System Management, Market Participants and Network Operators must comply with that documented Market Procedure in respect of communications and control system requirements.

. .

Clause 2.37.8 is proposed to be amended to:

- refer to the Market Procedure in (head of power) clause 2.43.1; and
- correct a minor typographical oversight.
- 2.37.8. Where any of the circumstances specified in the relevant-Market Procedure specified in clause 2.43.1 for the purposes of this clause (which are circumstances that may result in an increase or decrease in a Market Participant's Credit Limit) have occurred or may-occur, occur:
 - (a) the Market Participant must notify AEMO as soon as practicable if the circumstance may result in an increase in the Market Participant's Credit Limit; and
 - (b) the Market Participant may notify AEMO if the circumstance may result in a decrease in the Market Participant's Credit Limit.

. . .

The section 2.43 heading is proposed to be amended for consistency with the intent of the Rule Change Proposal to delete the name of Market Procedures (including Power System Operation Procedures).

2.43. Prudential Market Procedure Requirements

Clause 2.43.1 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

- 2.43.1. AEMO must develop a Market Procedure dealing with:
 - (a) determining Credit Limits;
 - (b) assessing persons against the Acceptable Credit Criteria;
 - (c) Credit Support arrangements, including:

- i. the form of acceptable guarantees and bank letters of credit;
- ii. where and how it will hold cash deposits and how the costs and fees of holding cash deposits will be met;
- iii. the application of monies drawn from Credit Support in respect of amounts owed by the relevant Market Participant to AEMO;
- (d) calculation of Trading Margins;
- (e) the list of factors to be taken into account for assessing the expected value of transactions:
- (f) issuing of Margin Calls; and
- (g) other matters relating to clauses 2.37 to 2.42.7

and Market Participants and AEMO must comply with that Market Procedure.

. . .

Clause 3.2.2 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.2.2. System Management must record Equipment Limit information in accordance with the Power System Operation Procedure specified in clause 3.2.7.

. . .

Clause 3.2.4 is proposed to be amended to:

- refer to the Power System Operation Procedure in (head of power) clause 3.2.7; and
- make consequential changes to the clause.
- 3.2.4. Network Operators, in consultation with System Management, must determine any Security Limit in accordance with the Power System Operation Procedure specified in clause 3.2.7, and System Management must record Security Limit information in accordance with the that Power System Operation Procedure.

. . .

Clause 3.2.6 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

- 3.2.6. System Management must establish and modify the Technical Envelope in accordance with clause 3.2.5 and the Power System Operation Procedure specified in clause 3.2.7.
- 3.2.7. System Management must develop a Power System Operation Procedure documenting:
 - (a) the process to be followed by System Management in maintaining Equipment Limit information;



- (b) the process to be followed by Network Operators and System Management in determining the Security Limits and maintaining Security Limit information:
- (c) the process to be followed by System Management in establishing and modifying the Technical Envelope; and
- (d) the processes to be followed by System Management to enable it to ensure the SWIS operates according to the Technical Envelope applicable to each SWIS Operating State.

Clause 3.2.8 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.2.8. System Management must ensure the SWIS operates in accordance with the Power System Operation Procedure <u>specified in clause 3.2.7</u> and the Technical Envelope for the applicable SWIS Operating State.

. . .

Clause 3.3.3 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.3.3. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will take into account in making a determination under clause 3.3.1.

. . .

Clause 3.4.9 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.4.9. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will consider in making a determination under clause 3.4.1.

. . .

Clause 3.5.11 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.2.7.

3.5.11. System Management may include in the Power System Operation Procedure specified in clause 3.2.7 guidelines describing matters it will consider in making determination under clause 3.5.1.



Clause 3.11.14 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.11.14. System Management must document in the <u>a</u> Power System Operation Procedure the procedure to be followed, and must follow that documented Market Procedure, when:
 - (a) determining Ancillary Service Requirements; and
 - (b) entering into Ancillary Service Contracts, including the process for conducting competitive tender processes utilised for the awarding of Ancillary Service Contracts.

. .

Clause 3.11.15 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.11.15. System Management must document in the <u>a</u> Power System Operation Procedure the procedure to be followed where the Market Rules require Ancillary Services to be provided. System Management and Rule Participants must comply with that documented Market Procedure.

. . .

Clause 3.16.4 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.4. Unless otherwise directed by System Management, Rule Participants must provide the following data to System Management in respect of each week in the medium term planning horizon described in clause 3.16.2 by the time specified in the Power System Operation Procedure specified in clause 3.16.10:

. . .

Clause 3.16.7 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.7. Rule Participants must provide the information System Management requests, and any other data they are aware of that might be relevant to a Medium Term PASA study, within the timeframe specified in the Power System Operation Procedure specified in clause 3.16.10.

. . .

Clause 3.16.8A is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.16.10.

3.16.8A. Rule Participants must provide any additional information or clarifications requested by System Management, within the time frame specified in the Power System Operation Procedure specified in clause 3.16.10.

. . .

Clause 3.16.10 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.16.10. System Management must document the procedure it follows in conducting Medium Term PASA studies in the <u>a</u> Power System Operation Procedure and System Management must follow that documented Market Procedure when conducting a Medium Term PASA study.

Clause 3.17.10 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement

for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

3.17.10. System Management must document the procedure it follows in conducting Short Term PASA studies in—the <u>a</u> Power System Operation Procedure-and System Management must follow that documented Market Procedure when conducting a Short Term PASA study.

- - -

Clause 3.18.3 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.18.21 in subclauses (c)(i) and (ii).

3.18.3.

. . .

- (c) Economic Regulation Authority may give a direction to System

 Management that a Facility or item of equipment should not remain on the list where it finds that:
 - System Management has not followed the Market Rules or the Power System Operation Procedure <u>specified in clause 3.18.21</u> in compiling the list under clause 3.18.2; and
 - ii. if the Market Rules and the Power System Operation Procedure specified in clause 3.18.21 had been followed, then the Facility or item of equipment would not have been on the list.

. . .

. . .

Clause 3.18.15 is proposed to be amended to:

- refer to the Power System Operation Procedure in (head of power) clause 3.18.21 in subclauses (a) and (f)(i) and (ii); and
- make consequential changes to the clause.
- 3.18.15. Where System Management informs a Market Participant or Network Operator that an Outage Plan has not been scheduled or has been removed from System Management's outage schedule under clause 3.18.13(d)(ii), the Market Participant or Network Operator may apply to Economic Regulation Authority to reassess the decision in accordance with the following procedures:
 - (a) A Participant or Network Operator can only apply for Economic Regulation Authority to reassess a decision on the grounds that System Management has not followed the Market Rules or its the Power System Operation Procedure specified in clause 3.18.21;



- (f) Economic Regulation Authority may give a direction to System Management that the Outage Plan should be scheduled in System Management's outage schedule where it finds that:
 - System Management has not followed the Market Rules or its the Power System Operation Procedure specified in clause 3.18.21; and
 - ii. if the Market Rules and the Power System Operation Procedure

 specified in clause 3.18.21 had been followed, then the Outage Plan
 would have been scheduled: and

. . .

. . .

Clause 3.18.21 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.18.21. System Management must document the procedure it follows in conducting outage planning in the <u>a</u> Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure when planning outages.

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Clause 3.19.10 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.19.14.

3.19.10. Where a Market Participant or Network Operator has reason to believe that System Management has not followed the Market Rules or the Power System Operation Procedure specified in clause 3.19.14 in its decision to reject an outage it may report the decision to the Economic Regulation Authority as a potential breach of the Market Rules in accordance with clause 2.13.4.

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Clause 3.19.14 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on

the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

3.19.14. System Management must document the procedure it follows in conducting final approval of outages in the <u>a</u> Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure when conducting final approval of outages.

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Clause 3.21.12 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21.12. System Management must document the procedure to be followed in determining and reporting Forced Outages and Consequential Outages in the a Power System Operation Procedure and System Management, Market Participants and Network Operators must follow that documented Market Procedure.

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Clause 3.21A.15 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21A.15. System Management must document the procedure it follows in scheduling and approving Commissioning Tests in the a Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure when planning and conducting Commissioning Tests.

Clause 3.21B.5 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.21B.8.

- 3.21B.5. System Management may only withhold the permission described in clause 3.21B.1 if:
 - (a) the request for that permission is not in compliance with clause 3.21B.2 or the Power System Operation Procedure specified in clause 3.21B.8; or
 - (b) granting permission would mean that System Management would be incapable of maintaining the Ready Reserve Standard.

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Clause 3.21B.8 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 3.21B.8. System Management must document the procedure it follows to grant permission in accordance with section 3.21B in the a Power System Operation Procedure and System Management and Market Participants must follow that documented Market Procedure.

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Clause 4.15.14 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.5.14. AEMO must document the procedure it follows in conducting the Long Term PASA, and which the Economic Regulation Authority must follow in conducting reviews under clause 4.5.15, in a Market Procedure. The Economic Regulation Authority and Rule Participants, including AEMO, must follow that documented Market Procedure in the conduct of the Long Term PASA study and the review under clause 4.5.15, as applicable.

Clause 4.5.14B is proposed to be amended:

- to improve the clarity of the drafting;
- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.5.14B. AEMO must document <u>in a Market Procedure</u> the procedure it follows in <u>calculating</u> <u>calculating</u>:
 - (a) the Expected DSM Dispatch Quantity; and
 - (b) the DSM Activation Price.

and Rule Participants, including AEMO, must follow that documented Market Procedure.

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Clause 4.5.15 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

- 4.5.15. From time to time, and at least once in every five year period starting from Energy Market Commencement, the Economic Regulation Authority must conduct a review of the Planning Criterion and the process in the Market Procedure specified in clause 4.5.14 by which AEMO forecasts SWIS peak demand. This review must include:
 - (a) a review of the technical analysis; and
 - (b) a cost-benefit study on the effects on stakeholders of a variety of levels of generation adequacy.

Clause 4.5.16 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

4.5.16. In conducting a review under clause 4.5.15, the Economic Regulation Authority must invite submissions in accordance with-a the Market Procedure specified in clause 4.5.14 on the performance of the Planning Criterion and the process by which AEMO forecasts SWIS peak demand from Rule Participants and take any submissions into account in the review.

Clause 4.5.17 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.5.14.

- 4.5.17. In accordance with-a the Market Procedure specified in clause 4.5.14, the Economic Regulation Authority must make available a draft of the report described in clause 4.5.18 to Rule Participants for comment and invite submissions on the draft report.
- 4.5.18. After concluding the review described in clause 4.5.15, the Economic Regulation Authority must publish a final report containing:
 - (a) issues identified by the Economic Regulation Authority;
 - (b) assumptions made by the Economic Regulation Authority in undertaking the review;
 - (c) submissions received by the Economic Regulation Authority from Rule Participants in accordance with clause 4.5.16;
 - (d) the Economic Regulation Authority's responses to the issues raised in those submissions:
 - (e) the results of the technical and cost-benefit studies;
 - (f) the submissions on the draft report received by the Economic Regulation Authority from Rule Participants in accordance with clause 4.5.17;
 - (g) the Economic Regulation Authority's responses to the issues raised in those submissions; and
 - (h) any recommended changes to the Planning Criterion.

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Clause 4.9.10 is proposed to be amended to:

- improve the clarity of the drafting; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.9.10. AEMO must document in a Market Procedure the procedure that:
 - (a) Market Participants must follow in the process of when applying for Certified Reserve Capacity; and
 - (b) AEMO must follow-in when processing applications for Certified Reserve Capacity, including how Certified Reserve Capacity is assigned and Reserve Capacity Obligation Quantities are set.

in a Market Procedure. in a Market Procedure. AEMO and Market Participants must follow that documented Market Procedure when Market Participants are



applying for Certified Reserve Capacity and when AEMO is processing those applications.

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Clause 4.13.8 is proposed to be amended:

- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them;
- · to correct a minor drafting oversight; and
- for consistency with the current drafting style of the Market Rules.
- 4.13.8. AEMO must develop a Market Procedure dealing with:
 - (a) determining Reserve Capacity Security;
 - (b) assessing persons against the Acceptable Credit Criteria;
 - (c) Reserve Capacity Security arrangements, including:
 - i. the form of acceptable guarantees and bank undertakings;
 - ii. where and how it will hold cash deposits and how the costs and fees of holding cash deposits will be met;
 - iii. the application of monies drawn from Reserve Capacity Security in respect of amounts payable by the relevant Market Participant to AEMO under clause 4.13.11A; and
 - (d) other matters relating to clauses section 4.13,.

 and Market Participants and AEMO must comply with that Market Procedure.

Clause 4.14.11 is proposed to be amended:

- correct a minor typographical oversight;
- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.14.11. AEMO must develop a Market Procedure documenting the process AEMO and Rule Participants must follow for the declaration under this clause section 4.14 and Reserve Capacity Auction. AEMO and Rule Participants must comply with that documented Market Procedure.

Clause 4.17.9 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.17.9. AEMO must document the Reserve Capacity Auction submission and clearing process in a Market Procedure, and AEMO and Market Participants must follow that documented Market Procedure.

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Clause 4.24.18 is proposed to be amended to:

- improve the clarity of the drafting;
- to correct a minor drafting oversight; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.24.18. AEMO must document in a Market Procedure the procedures it follows in:
 - (a) acquiring Eligible Services;
 - (b) entering into Supplementary Capacity Contracts; and
 - (c) determining the maximum contract value per hour of availability for any Supplementary Capacity Contract_¬,

in a Market Procedure, and must follow that documented Market Procedure.

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Clause 4.25.14 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.25.14. AEMO must document the procedure to be followed in performing Reserve Capacity Tests in a Market Procedure., and AEMO and Market Participants must follow that documented Market Procedure in the performance of Reserve Capacity Tests.

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Clause 4.25A.1 is proposed to be amended to refer to the Market Procedure in (head of power) clause 4.25.14.



- 4.25A.1. In each Capacity Year each Market Customer must undertake a Verification Test during the period specified in clause 4.10.1(f)(vi) for each Demand Side Programme registered to the Market Customer. Each test must be conducted in accordance with a the Market Procedure specified in clause 4.25.14 and be carried out:
 - (a) within 20 Business Days of registration, as notified by AEMO under clause 2.31.6, of the Demand Side Programme, if applicable; or
 - (b) between 1 October and 30 November.

. . .

Clause 4.27.12 is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.27.12. AEMO must document the procedure to be followed in performing Reserve Capacity monitoring in a Market Procedure, and AEMO and Market Participants must follow that documented Market Procedure in the performance of Reserve Capacity monitoring. Amongst other things, the Market Procedure must list the documents and other items that may be required by AEMO as supporting evidence in accordance with clause 4.27.11D.

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Clause 4.28B.9 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 4.28B.9. AEMO must document the process for applying for and approving Capacity Credits in accordance with this <u>clause section</u> 4.28B in a Market Procedure, and AEMO and Market Participants must follow that documented Market Procedure.

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Clause 4.28C.15 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

4.28C.15. AEMO must document the process for applying for and approving Capacity Credits in accordance with this-clause <u>section</u> 4.28C in a Market Procedure., and AEMO and Market Participants must follow that documented Market Procedure.

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Clause 6.17.6F is proposed to be amended to:

- improve the clarity of the drafting;
- for consistency with the current drafting style of the Market Rules; and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 6.17.6F. AEMO must document <u>in a Market Procedure</u> the procedure it follows<u>in when</u> making the adjustment referred to in clause 6.17.6E<u>.</u>, and Rule Participants, including AEMO, must follow the documented Market Procedure.

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Clause 6.19.6 is proposed to be amended to delete the name of the Market Procedure (Contingency Market Procedure) in subclause (f), and instead refer to the Market Procedure specified in (head of power) clause 6.19.10.

6.19.6. A Market Advisory must contain the following information:

. . .

(f) any actions Market Participants or Network Operators are required to take in response to the situation, including whether any Contingency Market Procedure specified in clause 6.19.10 is applicable; and

. . .

. . .

Clause 6.19.10 is proposed to be amended to delete the name of the Market Procedure (Contingency Market Procedure).

- 6.19.10. AEMO may create one or more Contingency Market Procedures to deal with contingencies, and:
 - (a) Market Participants must follow that documented Market Procedure after receiving a relevant Market Advisory; and
 - (b) AEMO must follow that documented Market Procedure after AEMO has issued a relevant Market Advisory.

Clause 7.2.5 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.2.5. Unless otherwise directed by System Management, each Market Generator must by 10 AM each day provide to System Management for each of its Intermittent Generators with capacity exceeding 10 MW its most current forecast of the MWh energy output of the Intermittent Generator for each Trading Interval between noon of the current Scheduling Day and the end of the corresponding Trading Day in a format and by a method specified in-the_a Power System Operation Procedure.

. . .

Clause 7.6.13 is proposed to be amended to:

- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.6.13. System Management must document in the a Power System Operation Procedure the procedure to be followed, and must follow that documented Market Procedure, when scheduling and issuing Operating Instructions to dispatch Registered Facilities covered by any Ancillary Service Contract in a form sufficient for audits and investigations under these Market Rules.

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Clause 7.6A.7 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.6A.7. Subject to clause 7.6A.8, System Management must document the procedures System Management and Synergy must follow to comply with this-clause section 7.6A, including the process to follow in developing the confidential procedure described in clause 7.6A.8, in-the a Power System Operation Procedure, and

System Management and Synergy must follow that documented Market Procedure.

Clause 7.6A.8 is proposed to be amended:

- for consistency with the current drafting style of the Market Rules; and
- to refer to the Power System Operation Procedure in (head of power) clause 7.6A.7.
- 7.6A.8. Any procedure created or data exchanged in accordance with this <u>clause section</u> 7.6A which is commercially sensitive information of Synergy must not be included in the Power System Operation Procedure <u>specified in clause 7.6A.7</u>. Instead, such information must be included in a confidential procedure developed by System Management in consultation with Synergy.

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Clause 7.6A.10 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 7.6A.7.

7.6A.10. AEMO may only decline to approve the confidential procedure, or an amendment to that procedure, if that document is inconsistent with the Market Rules or the market objectives or if it contains material which, in the reasonable view of AEMO, should be in the Power System Operation Procedure specified in clause 7.6A.7.

. . .

Clause 7.7.4A reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7.7.4A. When selecting Demand Side Programmes from the Non-Balancing Dispatch Merit Order, and subject to 7.6.1C and 7.6.1E, System Management must select them in accordance with the a Power System Operation Procedure. The selection process specified in the Power System Operation Procedure must:
 - (a) only discriminate between Demand Side Programmes based on response time and availability;

. . .

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Clause 7.7.5A is proposed to be amended to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.

7.7.5A. System Management must develop a Power System Operation Procedure specifying:

. . .

(d) for the purposes of clause 7.13.1C(e) – one or more methods that may be used to estimate the decrease in the output (in MWh) of each of Synergy's Non-Scheduled Generators as a result of an instruction from System Management to deviate from the Dispatch Plan or change their commitment or output in accordance with clause 7.6A.3(a).

System Management and Market Participants must comply with the Power System Operation Procedure.

Clause 7.7.5B is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7.7.5B. The quantity to be used for the purposes of clauses 6.15.2(b)(i) and 7.13.1(eF) is System Management's estimate, determined in accordance with the a Power System Operation Procedure, of the maximum amount of sent out energy, in MWh, which each Non-Scheduled Generator, by Trading Interval, would have generated in the Trading Interval had a Dispatch Instruction not been issued.

. . .

Clause 7.7.6 is proposed to be amended to:

- in subclause (a), to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- in subclause (b), refer to the Power System Operation Procedure in (head of power) clause 7.7.6(a).

7.7.6. Subject to clause 7.7.7:

- (a) and clause 7.7.7A, System Management must issue a Dispatch Instruction or an Operating Instruction by communicating it to the relevant Market Participant in accordance with—the a Power System Operation Procedure. System Management must develop a Power System Operation Procedure which prescribes a communication method or methods which allow sufficient time for the Market Participant to confirm and to respond to that Dispatch Instruction; and
- (b) a Market Participant must:
 - i. confirm receipt of the Dispatch Instruction or Operating Instruction;
 and
 - ii. advise if it cannot comply or cannot fully comply with the Dispatch Instruction or Operating Instruction.

The advice and confirmation under this clause 7.7.6 must be made in the time and manner set out in the Power System Operation Procedure specified in clause 7.7.6(a).

. . .

Clause 7.9.19 is proposed to be amended to delete the name of the Market Procedure (Dispatch).

- 7.9.19. System Management must document in the <u>a</u> Power System Operation Procedure for Dispatch the processes to be used:
 - (a) for applications under clause 7.9.13;
 - (b) by System Management in determining whether or not to grant an exemption under clause 7.9.14;
 - (c) by System Management in determining whether or not to revoke an exemption under clause 7.9.17;
 - (d) for notification of any exemptions granted or revoked by System Management; and
 - (e) publishing and maintaining on System Management's website any information and details with respect to any exemptions.

. .

Clause 7.10.4 is proposed to be amended to delete the name of the Market Procedure (Monitoring and Reporting Protocol), and instead refer to the Market Procedure specified in (head of power) clause 2.15.6A.

7.10.4. System Management must monitor the behaviour of Market Participants with Registered Facilities to assess whether they are complying with clause 7.10.1 in accordance with its Monitoring and Reporting Protocol the Market Procedure specified in clause 2.15.6A.

. . .

Clause 7.13.1(eD) is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7.13.1. System Management must prepare the following data for a Trading Day by noon on the first Business Day following the day on which the Trading Day ends:
 - ٠..
 - (eD) by Trading Interval, the Load Rejection Reserve Response Quantity and the Spinning Reserve Response Quantity calculated in accordance with the a Power System Operation Procedure;

. . .

Clause 7.13.3 is proposed to be amended to:

- correct a minor typographical oversight;
- give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate); and
- remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them.
- 7.13.3. System Management must document in the <u>a</u> Power System Operation Procedure the procedure to be followed by Rule Participants in providing settlement and monitoring data to AEMO. Rule Participants must comply with that documented Market Procedure.

. . .

Clause 7A.3.1 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (d), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

7A.3.1. AEMO must, to the extent that it is reasonably able, as soon as practicable during the first 15 minutes of each Trading Interval, for each future Trading Interval in the Balancing Horizon:

. . .

(d) if AEMO has sufficient information available to it, determine the Balancing Forecast in accordance with the Balancing Forecast Market Procedure specified in clause 7A.3.3 and publish it on the Market Web Site.

Clause 7A.3.2 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (c), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

7A.3.2. AEMO must determine a Forecast BMO for a Trading Interval for the purposes of clause 7A.3.1(a) by:

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where there is a tie in the ranking of Balancing Facilities under clause 7A.3.2(b), breaking the tie in accordance with the Balancing Forecast Market Procedure specified in clause 7A.3.3; and

- - -

Clause 7A.3.3 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure).

- 7A.3.3. AEMO must document in the Balancing Forecast a Market Procedure the processes it must follow when:
 - (a) determining Forecast BMOs and providing them to System Management;
 - (b) preparing and publishing Balancing Forecasts; and
 - (c) assigning priority to Facilities in the case where there is a tie in a Forecast BMO or Forecast LFAS Merit Order.

Clause 7A.3.4 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to delete the name of the Market Procedure (Balancing Forecast Market Procedure), and instead refer to the Market Procedure specified in (head of power) clause 7A.3.3.

- 7A.3.4. AEMO must develop the Balancing Forecast Market Procedure specified in clause 7A.3.3 in accordance with the following principles:
 - (a) to the extent reasonably practicable, Balancing Forecasts must use the latest information available to AEMO; and
 - (b) Balancing Forecasts must provide Market Participants with information upon which to make an assessment regarding their Balancing Submissions and whether to update a Balancing Submission.

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Clause 7A.3.7 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7A.3.7. System Management must, no later than two hours after the end of the Trading Day, prepare an estimate of:
 - (a) the SOI Quantity and the EOI Quantity for each Balancing Facility; and
 - (b) the Relevant Dispatch Quantity,

for each Trading Interval in the Trading Day, determined in accordance with the <u>a</u> Power System Operation Procedure.

Clause 7A.3.7A is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7A.3.7A. System Management must make reasonable endeavours to prepare, no later than five minutes after the end of each Trading Interval, an estimate of:

- (a) the SOI Quantity and the EOI Quantity for each Balancing Facility; and
- (b) the Relevant Dispatch Quantity,

for that Trading Interval, determined in accordance with the <u>a</u> Power System Operation Procedure.

. .

Clause 7A.3.15 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7A.3.15. System Management must, for each future Trading Interval in the Balancing Horizon, prepare a forecast of the Relevant Dispatch Quantity, and may prepare a forecast of the EOI Quantity for Non-Scheduled Generators, each determined in accordance with the a Power System Operation Procedure. -System Management must, each time it has new information on which to determine these quantities, update these forecasts, but is not required to do so more than once per Trading Interval.

. . .

Clause 7B.1.2 is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

- 7B.1.2. System Management must, in-the_a Power System Operation Procedure, specify any technical and communication criteria that an LFAS Facility, or a type of LFAS Facility, must meet, including:
 - (a) Facility quantity parameters and limits in providing LFAS, including the Minimum LFAS Quantity;
 - (b) the manner and forms of communication to be used in providing LFAS, including how LFAS Facilities which are Non-Scheduled Generators, are to be activated; and
 - (c) the nature and type of any enablement and quantity restrictions that will apply.

. . .

Clause 7B.1.4 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate).

7B.1.4. System Management must, by 12:00 PM on the Scheduling Day, determine the Forecast Upwards LFAS Quantity and the Forecast Downwards LFAS Quantity for

each Trading Interval in the next Trading Day in accordance with the \underline{a} Power System Operation Procedure.

. . .

Clause 7B.3.2 reflects the clause as it appears in the Amending Rules RC_2014_06 that will commence on 1 July 2019, and is proposed to be amended to:

- reflect the intent of the proposed changes to clause 7B.3.3 in the initial proposed Amending Rules;
- delete the name of the Market Procedure (Balancing Forecast Market Procedure) in subclause (c), and instead refer to the Market Procedure in (head of power) clause 7A.3.3; and
- improve the clarity of the drafting in subclause (c).

7B.3.2. AEMO must:

. . .

(c) in circumstances where if there is a tie in the ranking of LFAS Facilities in the LFAS Merit Order under clauses 7B.3.2(a) or 7B.3.2(b) in an LFAS Merit Order, then AEMO must break the tie for the Trading Interval in which the tie occurred in accordance with the Balance Forecast Market Procedure specified in clause 7A.3.3.

. . .

The Rule Change Panel intends to reject the proposed deletion of clause 8.6.2 in the Rule Change Proposal, but proposes to amend the clause to delete the name of the Market Procedure (Settlement Market Procedure), and to improve the clarity of the drafting.

8.6.2. AEMO must document the format of Meter Data Submissions in a Market
Procedure, and Metering Data Agents must comply with that documented Market
Procedure when developing and submitting Meter Data Submissions.

. . .

Clause 9.4.18 reflects the clause as it appears in the Amending Rules RC_2017_06 that will commence on 1 June 2019, and subclause (b) is proposed to be amended to correct a minor typographical error.

- 9.4.18. AEMO must develop a Market Procedure dealing with:
 - (a) Capacity Credit Allocations; and
 - (b) other matters relating to sections 9.4_{7} and 9.5.

. . .

Clause 9.20.1 is proposed to be amended to delete the name of the Market Procedure (Settlement Procedure), and instead refer to the Market Procedure to be documented under that (head of power) clause.

9.20.1. A Notice of Disagreement must be submitted to AEMO in accordance with the Settlement Market Procedure specified in clause 9.2.1.



Clause 10.2.7 is proposed to be amended:

- to give effect to the intent of the Rule Change Proposal to refer to 'a/the' Market Procedure (or Power System Operation Procedure) (as appropriate), and a reference to the relevant head of power clause (as appropriate);
- for consistency with the current drafting style of the Market Rules;
- to remove the express requirement for the persons named in the clause to follow or comply with the relevant Market Procedure (or Power System Operation Procedure), on the basis that clauses 2.9.7 to 2.9.8 of the Market Rules contain a general requirement for those persons to comply with the Market Procedures (which includes the Power System Operation Procedures) applicable to them; and
- to improve the clarity of the drafting.
- 10.2.7 AEMO must document the <u>in a Market Procedure the process</u> it follows in setting and publishing the confidentiality status of information in <u>clause section</u> 10.2. AEMO must comply with that documented Market Procedure.

. . .

11. Glossary

...

The Glossary definition of "Administration Procedure" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Administration Procedure: The Market Procedure developed by the Rule Change Panel in accordance with clause 2.9.5.

. .

The Glossary definition of "Balancing Forecast" is proposed to be amended to:

- improve the clarity of the drafting; and
- delete the name of the Market Procedure (Balancing Forecast Market Procedure), and instead refer to the Market Procedure in (head of power) clause 7A.3.3.

Balancing Forecast: Means, with respect to a Trading Interval, AEMO's forecast of each of the following matters (as determined in accordance with the Market Procedure referred to specified in clause 7A.3.19A7A.3.3):

- (a) the Relevant Dispatch Quantity for the Trading Interval;
- (b) the aggregate output of all Non-Scheduled Generators which are Balancing Facilities for the Trading Interval;
- (c) the Balancing Price for the Trading Interval; and



(d) the spare capacity for the Trading Interval.

. . .

The Glossary definition of "Equivalent Planned Outage Hours" is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 3.21.12.

Equivalent Planned Outage Hours: Means, in respect of a Facility, the sum of the "Planned Outage Hours" and the "Equivalent Planned Derated Hours" for the Facility as calculated in accordance with the Power System Operation Procedure specified in clause 3.21.12.

. .

The Glossary definition of "IMS Interface Market Procedure" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

IMS Interface Market Procedure: Means the Market Procedure developed under clause 2.36A.1.

. . .

The Glossary definition of "Monitoring and Reporting Protocol" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Monitoring and Reporting Protocol: The Market Procedure developed by AEMO and approved by the Economic Regulation Authority in accordance with clause 2.15.6A.

The Glossary definition of "Monitoring Protocol" is proposed to be deleted as the definition is redundant (as the names of Market Procedures (including Power System Operation Procedures) are being removed from the Market Rules).

Monitoring Protocol: The Market Procedure maintained by the Economic Regulation Authority in accordance with clause 2.15.1.

. . .

Appendix 9: Relevant Level Determination

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Appendix 9 is proposed to be amended to refer to the Power System Operation Procedure in (head of power) clause 7.7.5A at Step 4(a)(i).

- Step 4: For each Candidate Facility and Trading Interval identified in step 3(a):
 - (a) identify the actual quantity as determined in step 2 if:



- i. System Management has made a revised estimate of the maximum quantity in accordance with clause 7.7.5A(c) and the Power System Operation Procedure specified in clause 7.7.5A; and
- ii. the revised estimate of the maximum quantity is lower than the actual quantity as determined in step 2;

...